

StarEnterprise

L T Townsend
Manager
Port Arthur Area



P O Box 712
Port Arthur TX 77641 0712
409 989 7001

August 14, 1991

Re: Class 1 Permit Modifications
Star Enterprise-Port Arthur Plant
EPA I.D. No. TXD008097529
TWC Permit No. HW-50188-000
ENV 1381, 1310

RECEIVED
1991 AUG 22 PM 1:01
EPA REGION 1
HAZARDOUS WASTE
COMPLIANCE SECTION

Mr. Robert Layton
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, TX 75202-2733

Dear Mr. Layton:

Please refer to my May 1, 1991 letter to you transmitting Class 1 Permit Modifications as referenced above. The modifications were submitted in accordance with 40 CFR Section 270.42, to enable temporary authorization for operation of two (2) active consolidation/storage facilities, a protective filing on eight (8) consolidation/storage facilities, and the operation of a lined wastewater conveyance system.

As indicated in our May 1 letter, the eight (8) inactive consolidation/storage facilities identified as areas 10, 11, 12, 13, 14, 15, 18 and 19 on the Port Arthur Plant Topographic Map as contained in Attachment A of the Class 1 Permit Modifications did not receive waste (F037 or F038) after May 1, 1991. Since these facilities were inactive prior to May 2, 1991, the effective date of the Primary Sludge Regulation, and additional waste will not be placed in these inactive facilities, we are hereby rescinding the protective filing of these facilities as these facilities will not actively manage hazardous waste in the future. Attached is one copy of revised pages of the subject Class 1 Permit Modification application to replace those pages in the application transmitted to you in my May 1, 1991 letter. We will file a Class 3 Permit Modification by October 29, 1991, and these revisions will also be contained in that permit application filing.

Mr. Robert Layton

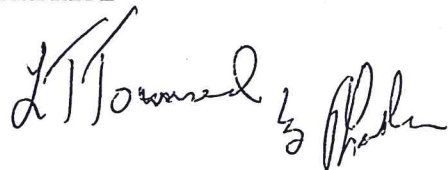
Page 2

August 14, 1991

If additional information is required, please contact Mr. R. L. Korbini
of my staff at (409) 989-7171.

Yours very truly,

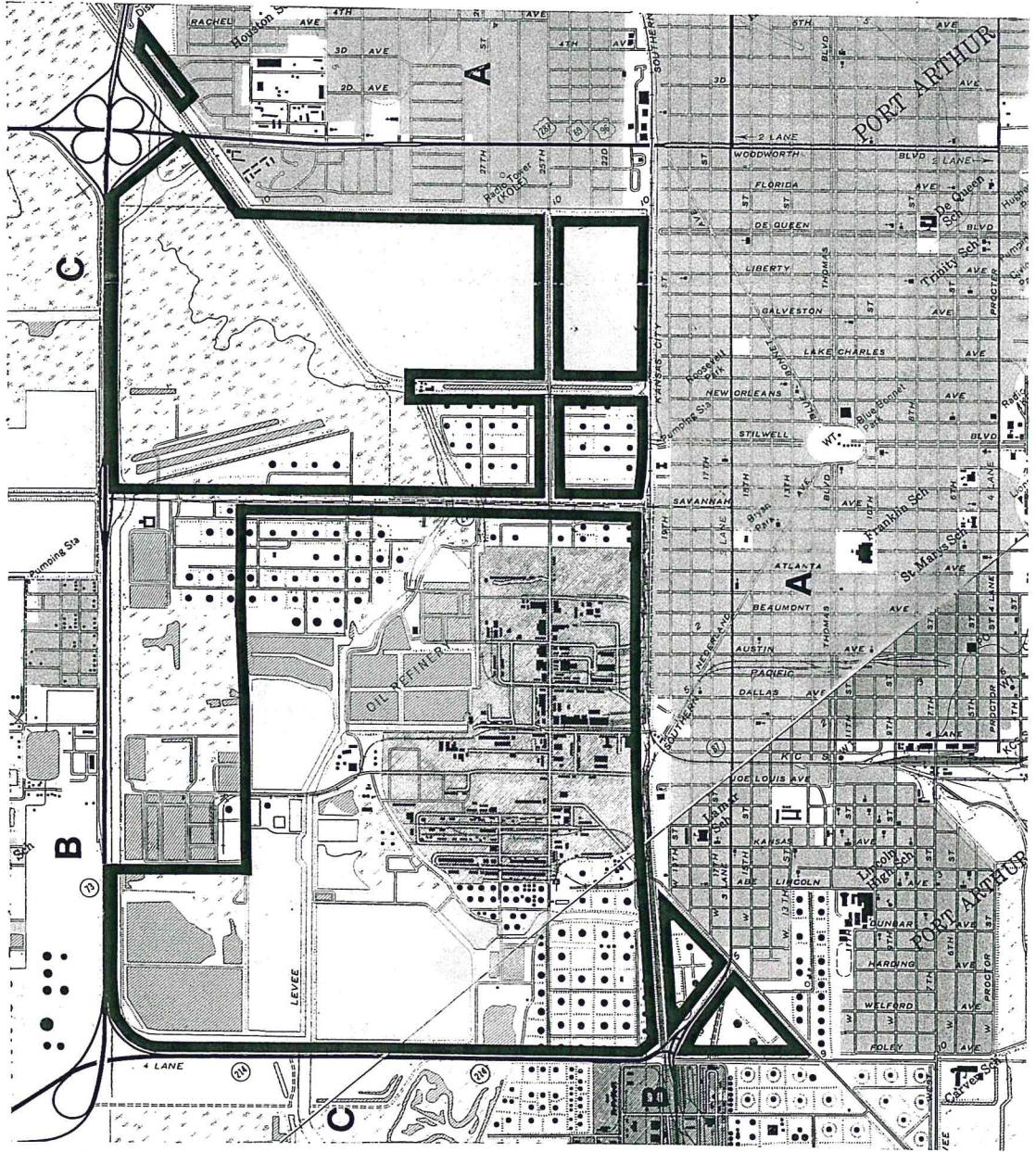
STAR ENTERPRISE

A handwritten signature in cursive script, appearing to read "L. Howard". The signature is written in dark ink and is positioned below the typed name "STAR ENTERPRISE".

RLK:JMDs

cc: Mr. Allen Beinke, TWC, Austin, TX

Enclosure



LAND USE KEY

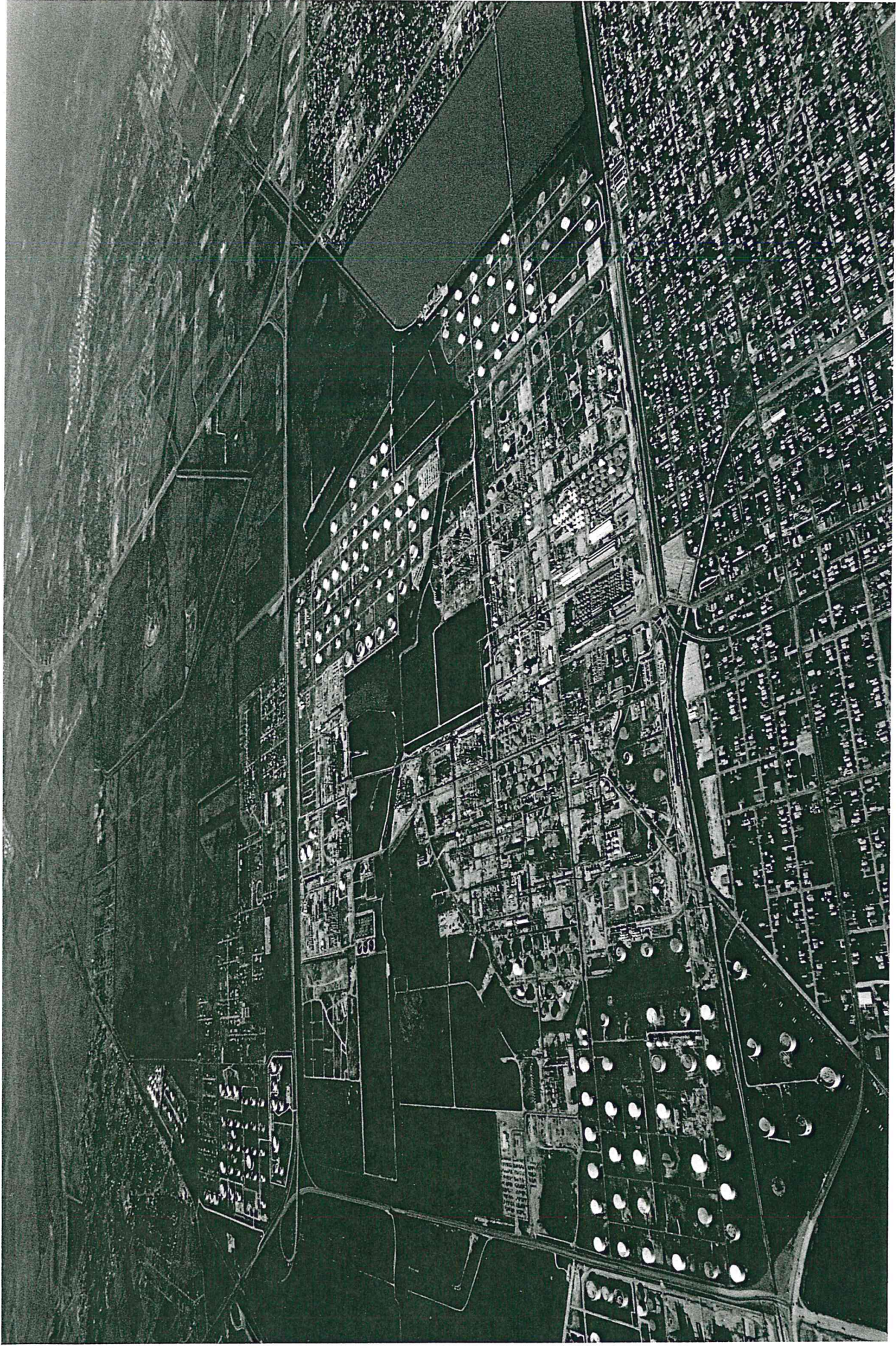
- A = RESIDENTIAL
- B = INDUSTRIAL
- C = UNDEVELOPED
- = FACILITY BOUNDARY

SOURCE: USGS 7.5 MIN
PORT ARTHUR NORTH AND
PORT ARTHUR SOUTH, TEXAS
QUADRANGLE MAPS.
(SCALE: 1" = 2000FT.)



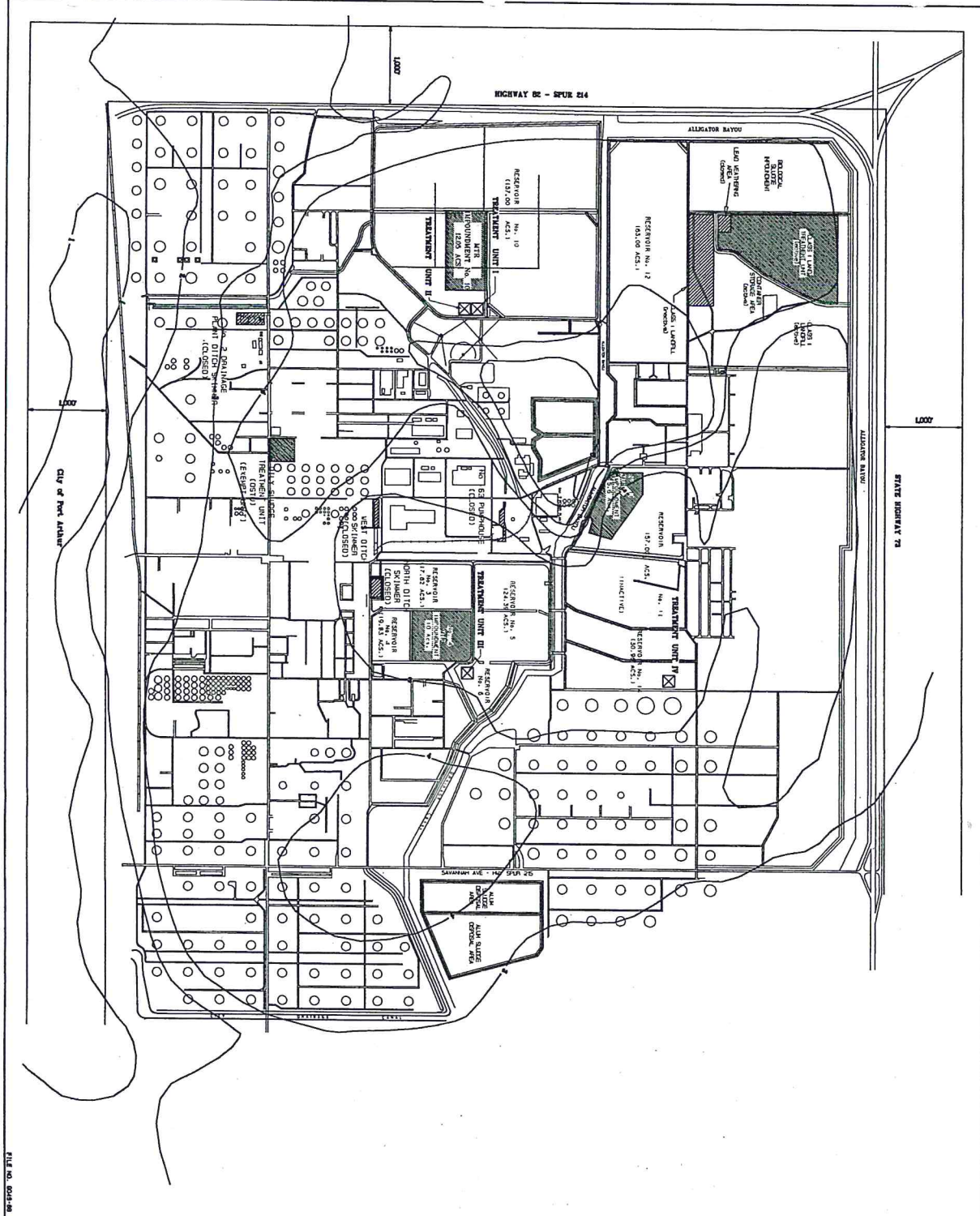
U.S.G.S. MAP			
INCLUDING SITE LOCATION			
& LAND USE PATTERNS			
STAR ENTERPRISE			
PORT ARTHUR, TEXAS			
JEFFERSON COUNTY			
ATTACHMENT	SCALE	DATE	SHEET
A	AS SHOWN	2/1/21	RD-9-25


STAR ENTERPRISE - PORT ARTHUR PLANT



ITEX ENTERPRISES™, INC.
Dallas Texas

AERIAL PHOTO SHOWING
LAND USAGE



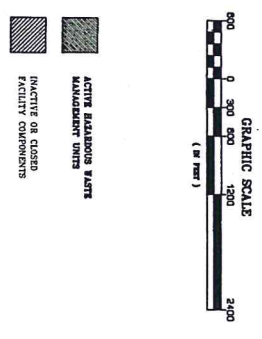


ITEX
COMPANIES

PORT ARTHUR PLANT
TOPOGRAPHICAL MAP

STATE ENTERPRISE
PORT ARTHUR, TEXAS
JEFFERSON COUNTY

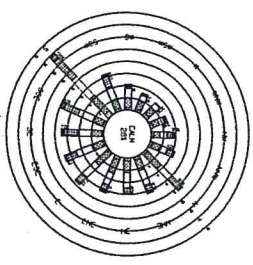
ATTACHMENT B	AS BUILT	DATE
		02-19-81
		004845



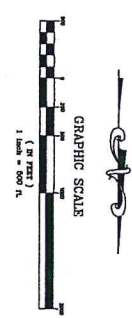
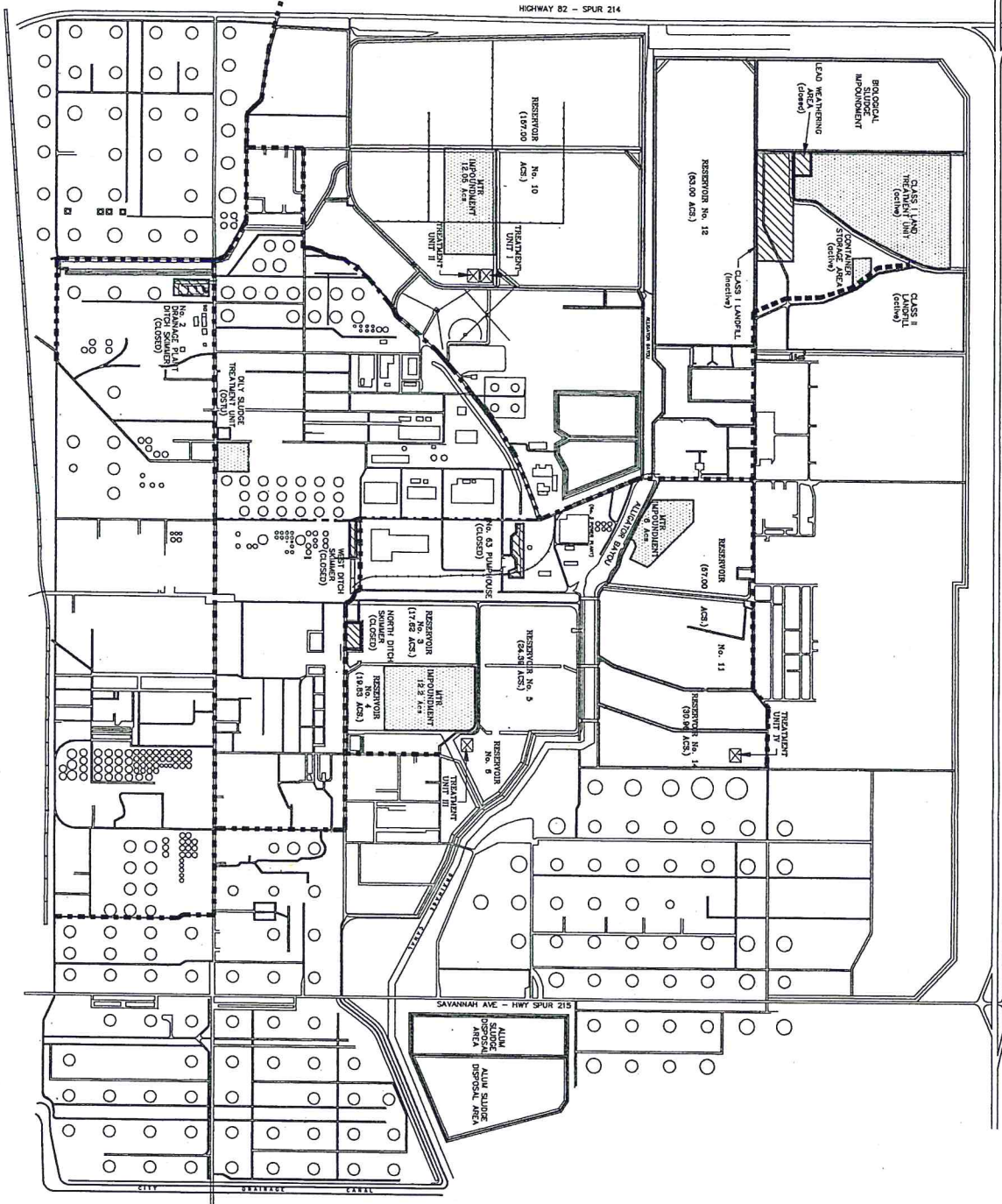
REGULATIONS AND INFORMATION OBTAINED FROM
PORT ARTHUR PLANT RECORDS, PORT ARTHUR, TEXAS
ARTHUR PLANT RECORDS, PORT ARTHUR, TEXAS
VOLUME 1, 1981 PREPARED BY SERVICES
ENGINEERING INFORMATION

1 - 3 mi
4 - 6 mi
7 - 10 mi
11 - 15 mi
above 17 mi

PORT ARTHUR AP
STATION B12817
WIND ROSE



HIGHWAY 82 - SPUR 214



- LOCATION OF ACTIVE HAZARDOUS WASTE FACILITY COMPONENTS
- LOCATION OF INACTIVE HAZARDOUS WASTE FACILITY COMPONENTS
- INTERNAL WASTE MOVEMENT ROUTES
- LOCATION OF MOBILE SLUDGE TREATMENT UNITS

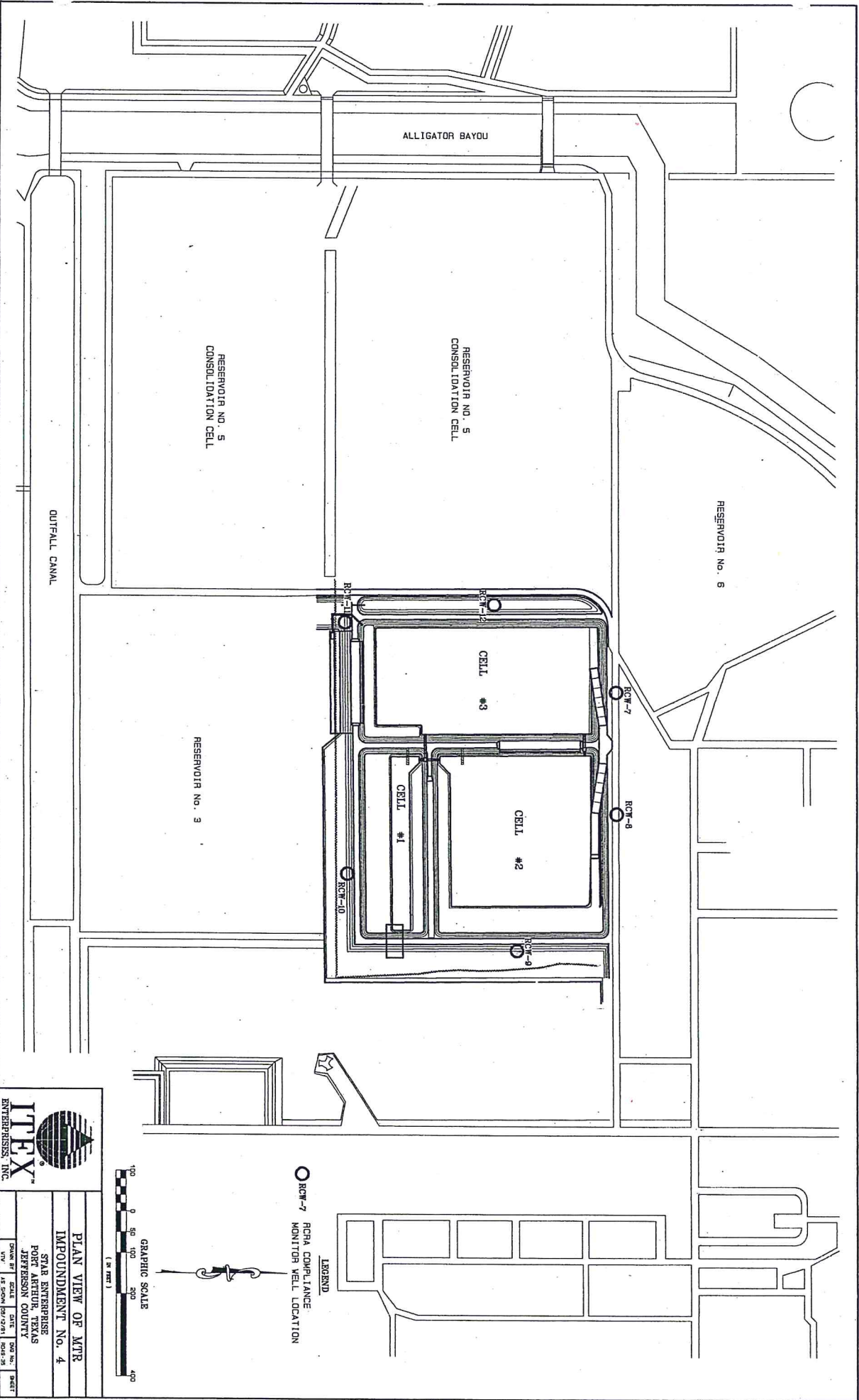
TTX COMPANIES

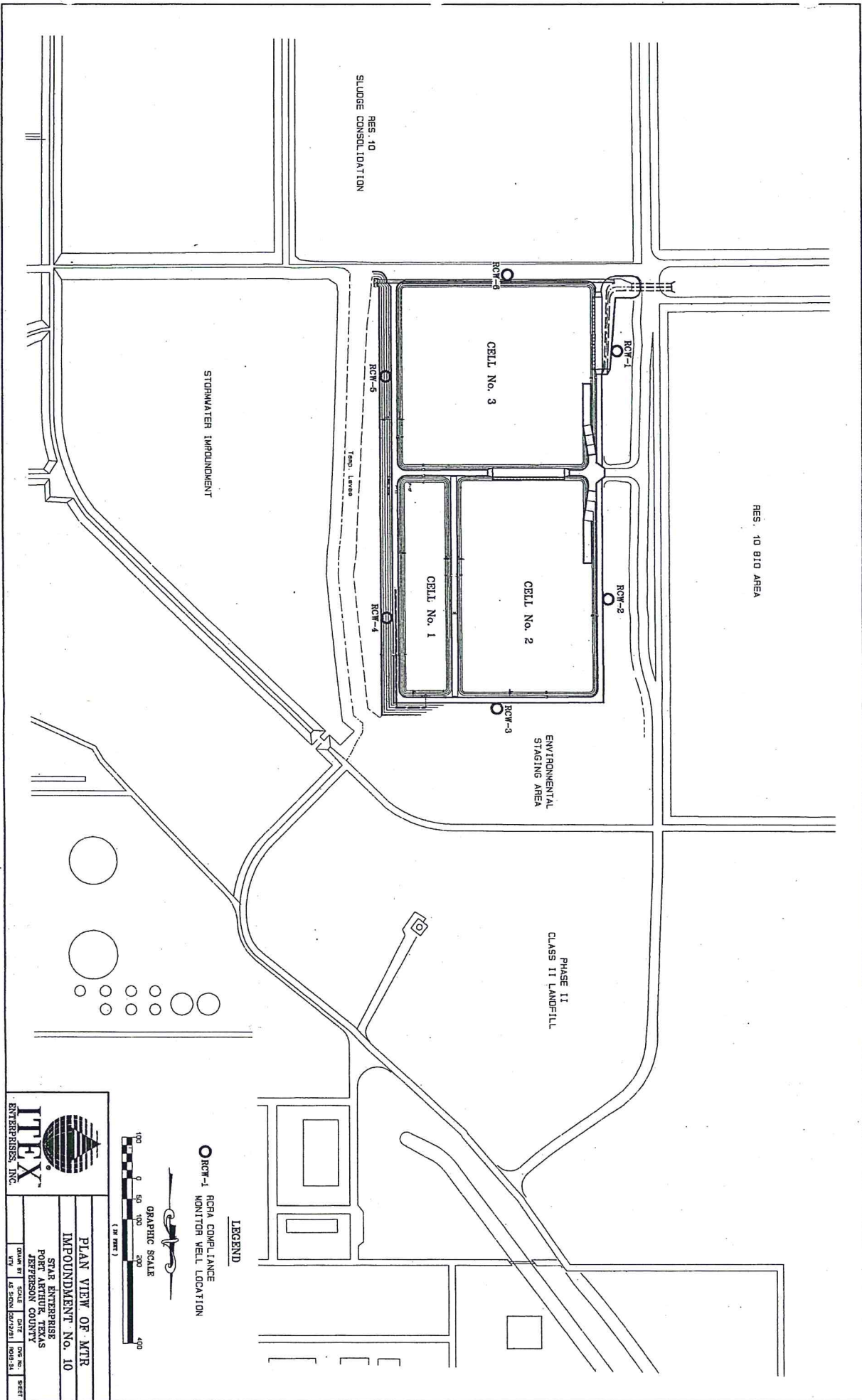
TYPICAL TRAFFIC ROUTES FOR INTERNAL WASTE MOVEMENT

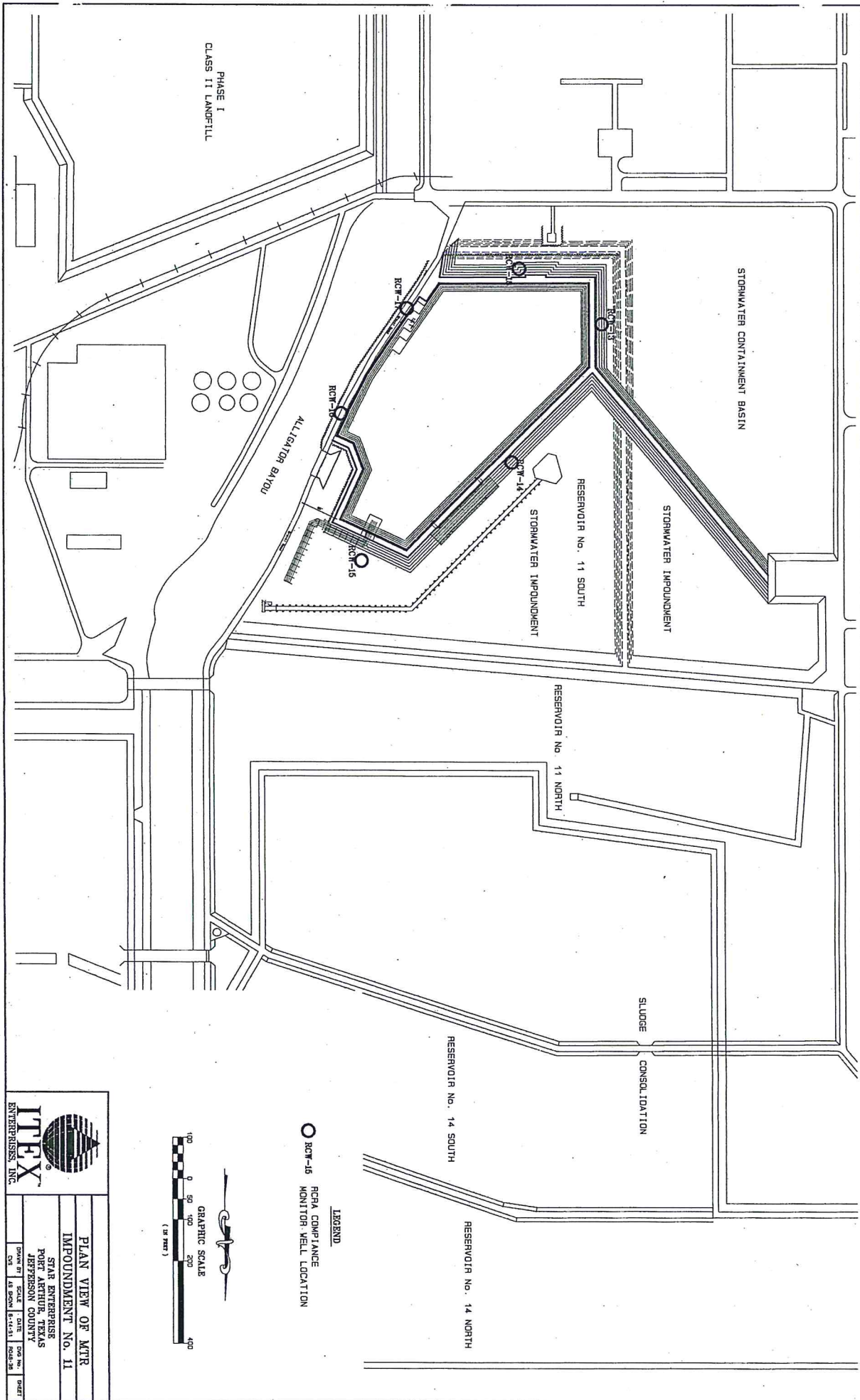
STAR ENTERPRISE PAPER MILL
JEFFERSON COUNTY, ALABAMA

SCALE: 1" = 500'
DATE: 10/15/84
DRAWN BY: J. L. BRYANT
CHECKED BY: J. L. BRYANT
APPROVED BY: J. L. BRYANT

REF. 10, 415







PLAN VIEW OF MTR			
IMPOUNDMENT No. 11			
STAB ENTERPRISE			
PORT ARTHUR, TEXAS			
JEFFERSON COUNTY			
DRAWN BY	SCALE	DATE	PROJ NO.
CCE	AS SHOWN	8-14-11	100-0-38
			SHEET

RESERVOIR No. 6

PLANT NORTH

LEGEND:

- RCW-8
- RCRA COMPLIANCE MONITOR WELL LOCATION
- GEOLOGIC CROSS SECTION ORIENTATION

CELL #2

CELL #1

CELL #3

4 MTR

RCW-7

RCW-8

RCW-9

RCW-10

RCW-11

RCW-12

A

A'

B

B'

125 0 125 FT SCALE

FIGURE IV-E-6a

PLAN VIEW OF

MTR IMPOUNDMENT NO. 4

PREPARED FOR

STAR ENTERPRISE

PORT ARTHUR, TX

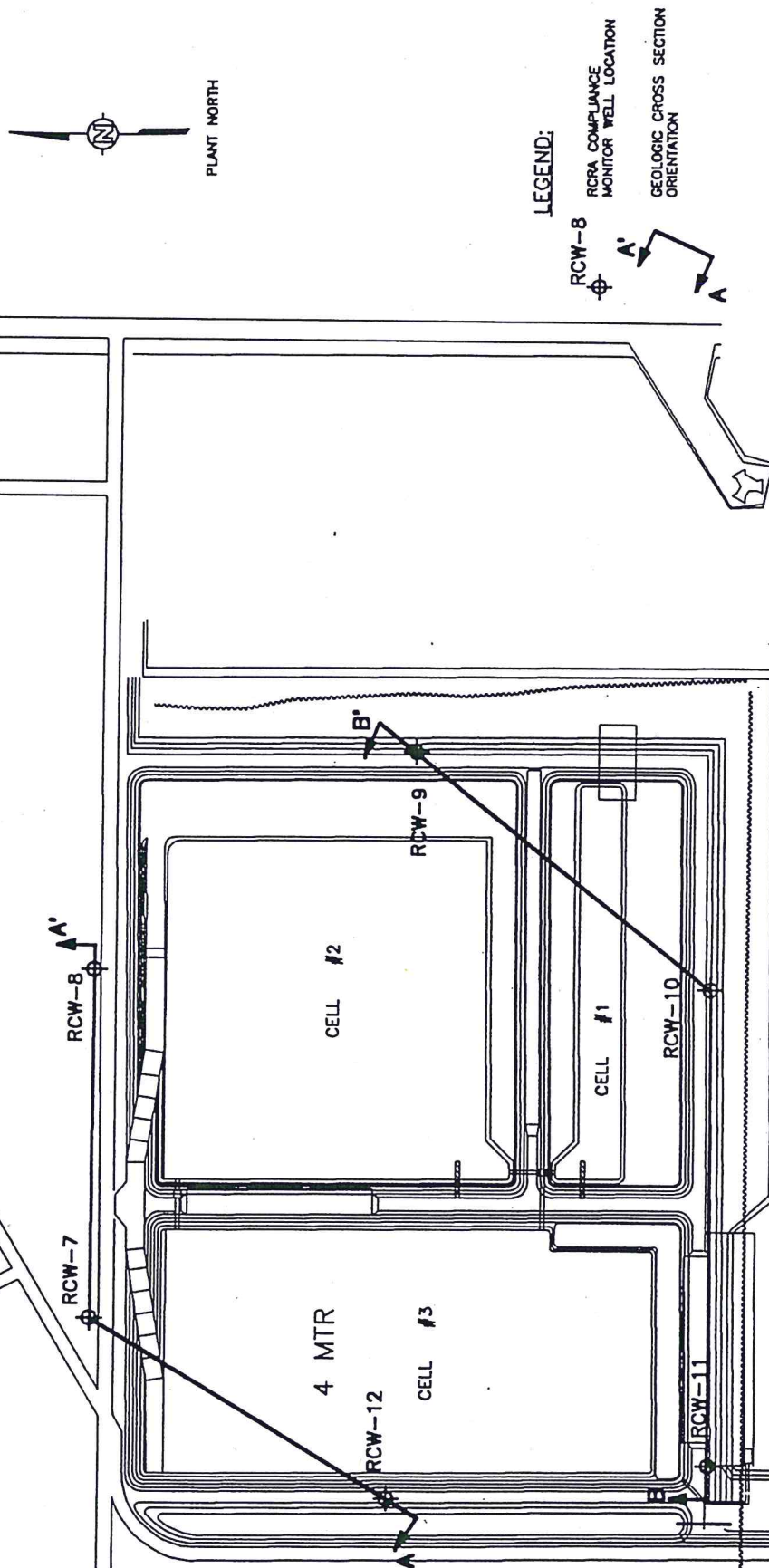
INTERNATIONAL TECHNOLOGY CORPORATION



**INTERNATIONAL
TECHNOLOGY
CORPORATION**

STAR ENTERPRISE
PORT ARTHUR, TX

FIGURE IV-E-6a
PLAN VIEW OF
MTR IMPOUNDMENT NO. 4



PLANT NORTH

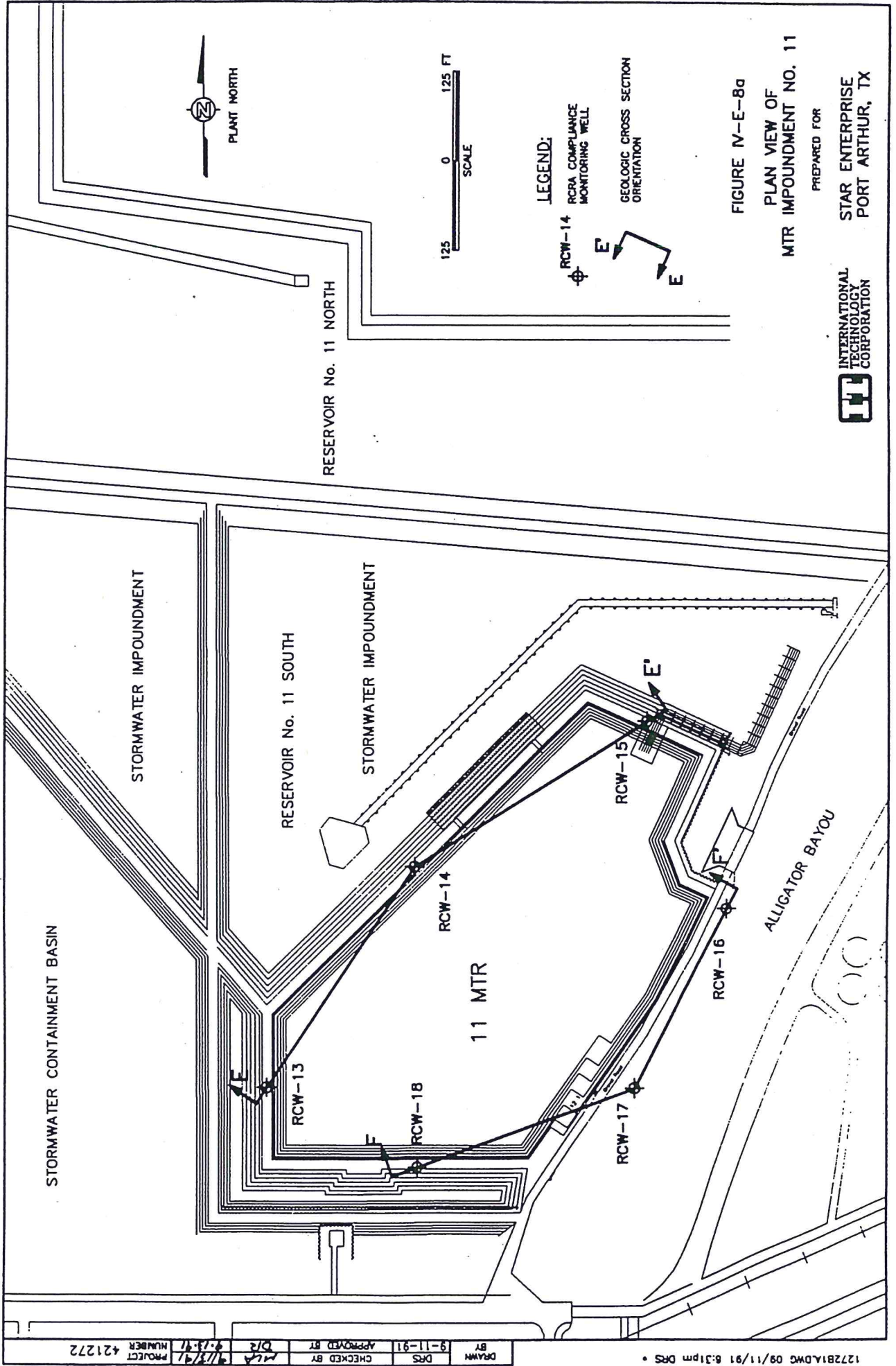


FIGURE N-E-8a

PLAN VIEW OF
MTR IMPOUNDMENT NO. 11

PREPARED FOR



STAR ENTERPRISE
PORT ARTHUR, TX

StarEnterprise

L T Townsend
Manager
Port Arthur Area



P O Box 712
Port Arthur TX 77641 0712
409 989 7001

September 24, 1990

Re: Class 1 Permit Modifications
Star Enterprise - Port Arthur Plant
EPA I.D. No. TXD008097529
TWC Permit No. HW-50188-000
ENV 1381, 1310

Mr. Robert E. Layton, Jr.
Regional Administrator
U.S. EPA Region VI
Allied Bank Tower
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Attention: Mr. Bill Honker, Chief
RCRA Permits Branch (6H-P)
Hazardous Waste Management Branch

Dear Mr. Layton:

Please find enclosed four copies of the Class 1 permit modification request referenced above. These modifications have been submitted in accordance with 40 CFR Section 270.42, to enable temporary authorization for operation of three surface impoundments at the subject facility.

These lined impoundments have been constructed within the confines of existing wastewater impoundments at the facility, and have been designed to Minimum Technology Requirements (MTR). They will be used to manage process wastewater and stormwater flows which may contain benzene in excess of 0.5 mg/l. Following September 25, 1990, the effective date of the new Toxicity Characteristic Leaching Procedure (TC), these impoundments may be subject to regulation under Subtitle C of RCRA.

Star Enterprise will prepare the required Class 3 Part B Permit Modifications within 180 days of the effective date of this new regulation.

1. Humbert
J. Dahlmann
2.

#1
Letter
sent

Reuter

Mr. Robert E. Layton, Jr.

Page 2

September 25, 1990

In addition, this submittal adds and/or further characterizes the wastes currently generated at our facility. The TC organic wastes will continue to be treated at our onsite facilities as the unit's capacity will allow.

If additional information is required, contact O. R. Marshall at (409) 989-7166.

Yours very truly,

STAR ENTERPRISE



ORM:JMBs

cc: Allen Bienke, TWC, Austin, TX

Enclosures

cc: Sherry Pierce, ITEX

HAZARDOUS WASTE RCRA PERMITS BRANCH

6H-P

ROUTING INITIAL

ARNOLD ONDARZA	<u>1</u>	<u>AB</u>
BILL GALLAGHER		
LAURIE BURCH	<i>Barbara log in & forward to 17</i>	
TONY ROBLEDO	<u>2</u>	
GLORIA RONQUILLO		
RANDALL BROWN		
GUANITA REITER		

COMMENTS Arnie - log in

Tony - Reviewed?

FROM: BILL HONKER, CHIEF
HAZARDOUS WASTE RCRA PERMITS BRANCH (6H-P)
PHONE: 655-6770

FEDERAL EXPRESS

QUESTIONS? CALL 88-5395 TOLL FREE

AIRBILL
PACKAGE
TRACK
NUMBER

7341447433

7341447433

Date
9/21/90

RECIPIENT'S COPY

From (Your Name) Please Print

Your Phone Number (Very Important)

Recipient's Name-Please Print

Recipient's Phone Number (Very Important)

Company

Department/Floor No.

Company

Department/Floor No.

Street Address

Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes)

City

State

ZIP Required

City

State

ZIP Required

YOUR INTERNAL BILLING REFERENCE INFORMATION (First 24 characters will appear on invoice.)

IF HOLD FOR PICK-UP, Print FEDEX Address Here

Street Address

City

State

ZIP Required

PAYMENT 1. ☒ Bill Sender 2. ☐ Bill Recipient's FedEx Acct. No. 3. ☐ Bill 3rd Party FedEx Acct. No. 4. ☐ Bill Credit Card

5. ☐ Cash

SERVICES (Check only one box)

DELIVERY AND SPECIAL HANDLING

PACKAGES

WEIGHT
In Pounds
Oz

VOLUME
CUBIC
FEET

SIZE

Emp. No.

Date

Federal Express Use
Base Charges:

Priority Overnight Service (Delivery by next business morning)

Standard Overnight Service (Delivery by next business afternoon)

1. ☐ HOLD FOR PICK-UP (P.O. Box)

2. ☒ DELIVER WEEKDAY

3. ☐ DANGEROUS GOODS (Extra charge Shipment)

4. ☐ CONSTANT SIGNATURE (C.S.S.) (Extra charge) (Please Signatures Not Applicable)

5. ☐ OTHER SPECIAL SERVICE

11. ☐ YOUR PACKAGING

16. ☐ FEDEX LETTER * 56. ☐ FEDEX LETTER *

12. ☐ FEDEX PAK * 52. ☐ FEDEX PAK *

13. ☐ FEDEX BOX 53. ☐ FEDEX BOX

14. ☐ FEDEX TUBE 54. ☐ FEDEX TUBE

15. ☐ FEDEX TUBE 54. ☐ FEDEX TUBE

16. ☐ FEDEX TUBE 54. ☐ FEDEX TUBE

Economy Service (formerly Standard Air)

Heavyweight Service (for Extra Large or any package over 150 lbs)

30. ☐ ECONOMY SERVICE

80. ☐ DEFERRED SERVICE

80. ☐ DEFERRED SERVICE

80. ☐ DEFERRED SERVICE

80. ☐ DEFERRED SERVICE

Very commitment may

Declared Value Limit \$100

Call for delivery schedule

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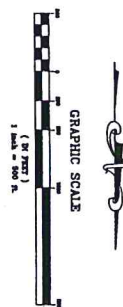
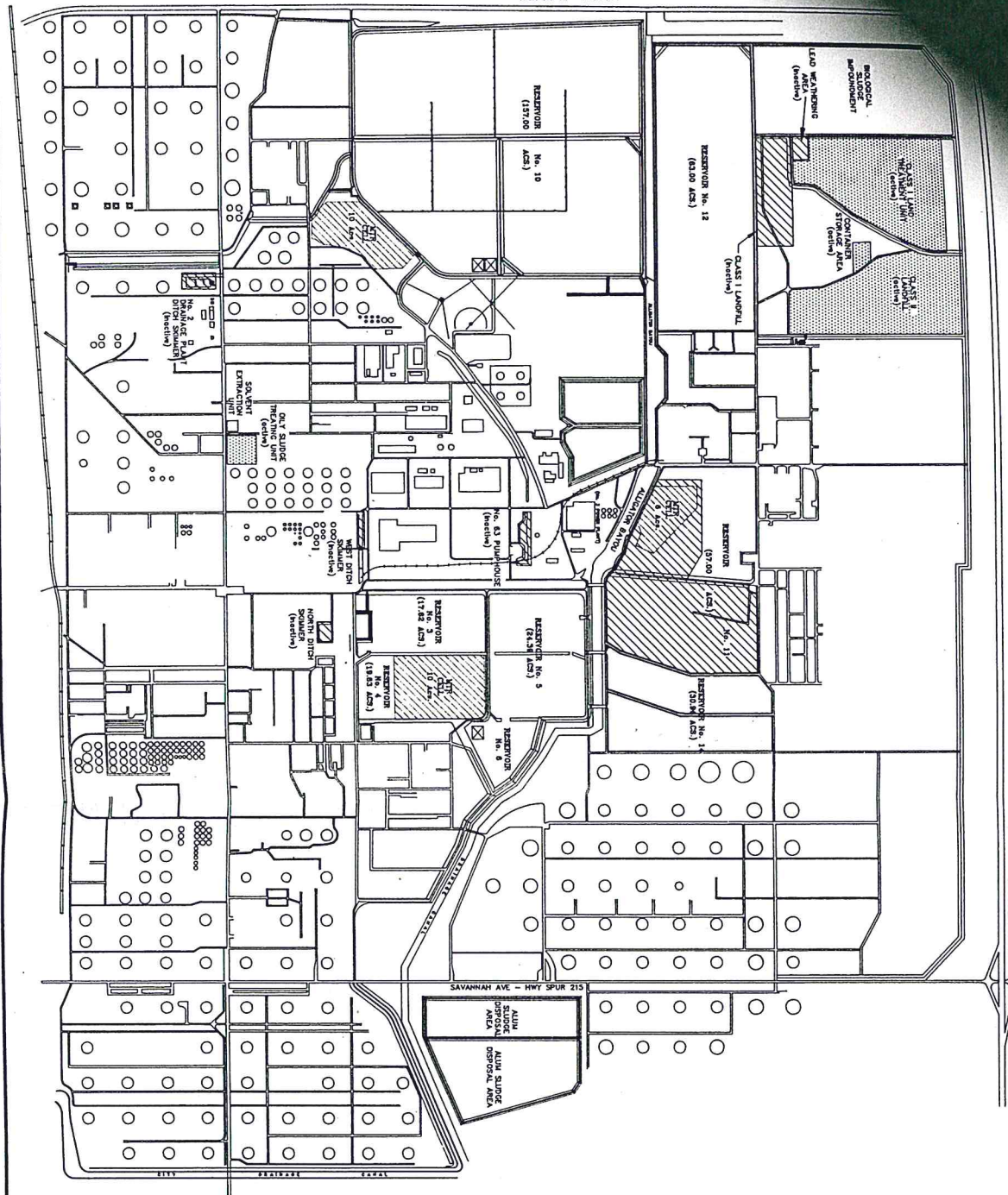
Call for delivery schedule

Call for delivery schedule

Call for delivery schedule

Call for delivery schedule

Call for delivery schedule



- LOCATION OF PREVIOUS FACILITY COMPONENTS
- LOCATION OF ACTIVE FACILITY COMPONENTS
- LOCATION OF INACTIVE FACILITY COMPONENTS
- LOCATION OF ANCHOR TREATMENT UNITS

ITEX
COMPANIES

MASTER REMEDIATION PLAN

LOCATION OF MTR CELLS AND EXISTING FACILITY COMPONENTS

STAR ENTERPRISE
PORT ARTHUR, TEXAS
JEFFERSON COUNTY

SCALE: 1" = 300'
DATE: 8-13-90
PAGE NO. 1 OF 1

StarEnterprise

M J Killien
Manager
Planning & Control
Port Arthur Area



P O Box 712
Port Arthur TX
77641 0712
409 989 7004

July 19, 1990

TXD008097529

Re: Star Enterprise
Permit No. HW-50188
Solid Waste Registration 30121
Minor Permit Amendment
ENV 1506 and 1513 and 1310

Mr. Allen Beinke
Executive Director
Texas Water Commission
P. O. Box 13087, Capitol Station
Austin, Texas 78711-3087

Dear Mr. Beinke:

This is to request a minor amendment to the subject solid waste permit. The amendment will update the information for the agent for service and the emergency coordinator's list. Enclosed are those applicable pages of the Part A and Part B permit applications.

Should questions arise, please contact O. R. Marshall at (409) 989-7166.

Yours very truly,

STAR ENTERPRISE

cc: Leon Byrd, TWC, Permits Section, Austin, Tx
Kathleen Kerr, TWC, Haz. & Solid Wst. Enforce Section, Austin, Tx
Dan Eden, TWC, Director, Haz & Solid Wst, Austin, Tx
Keith Anderson, TWC, District VI, Beaumont, Tx
Kelly Hargraves, TWC, District VI, Beaumont, Tx
Robert Layton, Jr., EPA, Region VI, Dallas, TX

ORM:1sp

TEXAS WATER COMMISSION
PERMIT APPLICATION
FOR
INDUSTRIAL SOLID WASTE STORAGE/PROCESSING/DISPOSAL FACILITY
PART A—FACILITY BACKGROUND INFORMATION

I. GENERAL INFORMATION

A. Applicant: Star Enterprise

(Individual, Corporation, or Other Legal Entity Name)

Address: P. O. Box 712

City: Pt. Arthur **State:** Texas **Zip Code:** 77641-0712

Telephone Number: (409) 982-5711

B. Authorized Agents

1. List those persons or firms authorized to act for the applicant during the processing of the permit application. Also indicate the capacity in which each person may represent the applicant (engineering, legal, etc.). The person listed first will be the primary recipient of correspondence regarding this application. Include the complete mailing addresses and phone numbers.

L. T. Townsend
Manager, Port Arthur Area
Star Enterprise
P. O. Box 712
Pt. Arthur, Texas 77641-0712
(409) 989-7001

2. List the individual and his/her mailing address that will be responsible for causing any necessary public notices to be published in the newspaper.

Name: Ronald L. Korbini

Address: P. O. Box 712

City: Pt. Arthur **State:** Texas **Zip Code:** 77641-0712

Telephone Number: (409) 989-7171

3. List the applicant's registered agent for service.

Name: Prentice-Hall Corporation System, Inc. **

Address: 807 Brazos

City: Austin **State:** Texas **Zip Code:** 78701

Telephone Number: (512) 474-9481

- C. Operator: Identify the entity who will conduct facility operations. If same as applicant, state "same as applicant."

Name: Same as Applicant

Address: _____

City: _____ **State:** _____ **Zip Code:** _____

(I.G.2. continued)

I, L. T. Townsend [Signature] Manager, Port Arthur Area
(Name) (Title)
I, _____
(Name) (Title)

Certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of civil penalty and criminal fine.

Signature: _____, Date: _____

Signature: _____, Date: _____

SUBSCRIBED AND SWORN to before me by the said L. T. Townsend on this 24th day of July,
19 90 My commission expires on the 23rd day of Sept., 19 93.

[Signature]
Notary Public in and for
Jefferson County, Texas

** As a partnership, Star cannot register an agent for service. Star has, however, hired Prentice Hall to accept service on its behalf.

EXECUTIVE DIRECTOR
TEXAS WATER COMMISSION
ATTN: Hazardous and Solid Waste Division
P.O. Box 13087, Capitol Station
Austin, Texas 78711

FOR DEPARTMENT USE ONLY
Application No. _____
Permit No. _____
Adm. Review By _____
Administratively _____
Complete _____
Copies Sent: _____

INDUSTRIAL HAZARDOUS WASTE PART B PERMIT APPLICATION

Please refer to the Instructions when preparing this application.

I. GENERAL INFORMATION

A. Applicant: Star Enterprise
(Individual, Corporation, or Other Legal Entity Name)
Address: North End of Houston Avenue
City: Port Arthur State: Texas Zip Code: 77640
Telephone Number: (409) 982-5711

If the application is submitted on behalf of a corporation, please identify the Charter Number as recorded with the Office of the Secretary of State for Texas. _____
(Charter Number)

- B. 1. List those persons or firms, including a complete mailing address and telephone number, authorized to act for the applicant during the processing of the permit application.

L. T. Townsend (409) 989-7171
Manager, Port Arthur Area
Star Enterprise
P. O. Box 712
Port Arthur, Texas 77640

2. If the application is submitted by a corporation or by a person residing out of state, the applicant must register an Agent in Service or Agent of Service with the Texas Secretary of State's office and provide a complete mailing address for the agent. The agent must be a Texas resident.

Star Enterprise may well be a Texas Resident and, as a partnership, cannot register an agent with the Secretary of State. Star has, however, hired Prentice Hall to accept service on its behalf. The address is Prentice-Hall Corporation System, Inc., 807 Brazos, Austin, Texas 78701.

3. List the individual and his/her mailing address that will be responsible for causing notice to be published in the newspaper.

Ronald L. Korbini
Star Enterprise
P. O. Box 712
Port Arthur, Texas 77640

I, L. T. Townsend, Manager, Port Arthur Area
(Name) (Title)

certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate and complete. I am aware there are significant penalties for submitting false information, including the possibility of civil penalty and criminal fines.

Signature: [Signature] Date: 7/23/90

TO BE COMPLETED BY THE APPLICANT IF THE APPLICATION IS SIGNED BY AN AGENT FOR THE APPLICANT.

I _____ hereby designate _____
(Print or Type Name) (Print or Type Name)

as my agent and hereby authorize said agent to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Water Commission in conjunction with this request for a Texas Water Code or Texas Solid Waste disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my agent in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

Printed or Typed Name of Applicant
or Principal Executive Officer

Signature

(Note: Application Must Bear Signature & Seal of Notary Public)

SUBSCRIBED AND SWORN to before me by the said

L. T. Townsend on this 23rd day of July, 19 90

My commission expires on the 23rd day of September, 19 93.

[Signature]
Notary Public in and for

Jefferson County, Texas

3. Emergency Coordinator's List

Persons qualified to act as emergency coordinator are listed below. The alternates are listed in the order in which they will assume responsibility. The emergency coordinator will be on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time), with the responsibility for coordinating all emergency response measures. The emergency coordinator is thoroughly familiar with all aspects of the facility's contingency plan, all hazardous waste operations and activities at the facility, the location and characteristics of hazardous waste handled, the location of all hazardous waste records within the facility, and the facility layout. In addition, this person has the authority to commit the resources needed to carry out the contingency plan.

<u>Name</u>	<u>Address</u>	<u>Office Phone(s) Home and/or pager</u>	<u>Phones(s)</u>
Primary:			
L. T. Townsend	1419 26th Street Nederland, Tx 77627	7001 88-271	(409) 724-7708
Alternates:			
M. J. Killien	3385 Shady Hollow Ln. Beaumont, Tx 77706	7004 88-274	(409) 899-3688

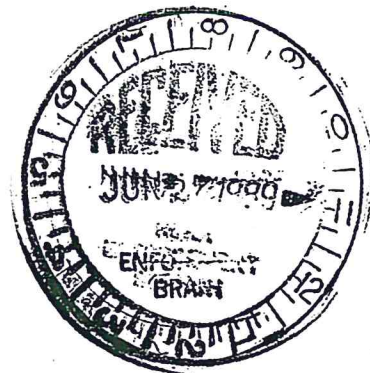
TEXAS WATER COMMISSION

B. J. Wynne, III, Chairman
Paul Hopkins, Commissioner
John O. Houchins, Commissioner



Allen Beinke, Executive Director
Michael E. Field, General Counsel
Brenda W. Foster, Chief Clerk

June 22, 1989



Mr. L. T. Townsend, Manager
Port Arthur Area
Star Enterprise
P. O. Box 712
Port Arthur, Texas 77640-0712

Re: RCRA Facility Investigation (RFI) Workplan
Hazardous Waste Permit No. HW-50188
Industrial Solid Waste Registration No. 30121
EPA I. D. No. TXD 008097528

Dear Mr. Townsend:

We have completed our review of the revised RFI Workplan submitted August 12, 1988. Our evaluation indicates that the proposed activities if properly executed, should satisfy the requirements of Provision IX. of Permit No. HW-50188. This letter constitutes approval of the RFI Workplan by the Executive Director of the Texas Water Commission and the Director of the Hazardous Waste Management Division of EPA Region VI. As required by permit Provision IX., Star Enterprise shall implement the RFI Workplan immediately upon receipt of this letter.

If you have any questions, please contact Mr. Leon Byrd of the Hazardous and Solid Waste Permits Section at AC512/463-7977.

Sincerely,

Handwritten signature of Daniel J. Eden.

Daniel J. Eden, Director
Hazardous and Solid Waste Division
Texas Water Commission

Handwritten signature of Allyn M. Davis.

Allyn M. Davis, Director
Hazardous Waste Management
EPA Region VI - Dallas

CLB:lab

cc: ✓ Matt Tokheim, EPA Region VI Office - Dallas
TWC District 6 Office - Beaumont

TEXAS WATER COMMISSION

B. J. Wynne, III, Chairman
Paul Hopkins, Commissioner
John O. Houchins, Commissioner



Allen Beinke, Executive Director
Michael E. Field, General Counsel
Brenda W. Foster, Chief Clerk

May 22, 1989

Mr. William K. Honker, Chief
RCRA Permits Branch
U. S. Environmental Protection Agency
Region VI - 6H-C
1445 Ross Avenue
Dallas, Texas 75202-2733

Re: RCRA Facility Investigation (RFI) Workplan
Star Enterprise
Hazardous Waste Permit No. HW-50188
EPA Permit No. TXD 008097520 9

Dear Mr. Honker:

We are transmitting for your review and approval a letter to Star, Enterprise approving their RFI workplan. Please sign the approval letter or notify us of any items in dispute within 10 days of receipt of this letter, and return the approval letter to us for mailing to the referenced facility.

If you have any questions, please contact Leon Byrd of the Hazardous and Solid Waste Permits Section at AC512/463-7977.

Sincerely,

Ray Henry Austin, P.E. for

Minor Brooks Hibbs, Chief
Permits Section
Hazardous and Solid Waste Division

CLB:lab

Enclosure

cc: L. T. Townsend, Star Enterprise
TWC District 6 Office - Beaumont

ITEX ENTERPRISES, INC.

TODAY IS MONDAY,
May 15, 1989

RECEIVED
MAY 24 10 7 22
1989

Mr. Tony Rebletto, Chief
Texas Permits Section
EPA Region VI
1445 Ross Avenue
Dallas, Texas 75202-2733

Re: Star Enterprise Port Arthur Plant;
EPA I.D. No. TXD008097529;
State N.O.R. No. 30121, Permit HW-50188

Dear Mr. Rebletto:

During sampling investigations to determine the suitability of sites on Star Enterprise's (Star's) Port Arthur refinery property for construction of new process units or expansions, Star confirmed that there has been a release of hazardous constituents at three areas. A meeting has been scheduled with the Texas Water Commission at 1:30 P.M. on Thursday, May 18, 1988 in Austin, Texas to discuss remediation activities for these areas.

You and/or appropriate members of your staff are invited to attend this meeting. Please contact me at 855-0510 to inform me of your intent to attend.

Sincerely,

Sherry A. Pierce

Sherry A. Pierce,
Director of Regulatory Compliance
ITEX Enterprises, Inc.

cc: R.Korbini
Leon Bryd, TWC

SP/RS/MS/GD/rth

StarEnterprise

L T Townsend
Manager
Port Arthur Area



P O Box 712
Port Arthur TX 77641 0712
409 989 7001

May 5, 1989

Re: Notification of Release and Closure Activities
Star Enterprise Port Arthur Plant
Permit No. HW-50188; N.O.R. 30122
ENV 775 and 1315

Mr. Dan Eden, Director
Hazardous and Solid Waste Division
Texas Water Commission
P. O. Box 13087
Austin, TX 78711

Dear Mr. Eden:

We are notifying you that a release of hazardous constituents has been confirmed at three areas at the Star Enterprise Port Arthur Plant. These areas are identified on the attached diagram as the Lummus, BS&W and DCU areas. The releases were documented during sampling investigations to determine the suitability of the sites for construction of new process units or expansions. The contamination appears to be the result of processing and raw materials handling over many years.

We would like to initiate remediation activities in the near future in these areas. We would like to meet with the appropriate members of your staff, during the week of May 15, 1989, to discuss these remediation procedures.

Please call Mr. Ron Korbini at (409) 989-7171 with any questions you have regarding this information. Mr. Korbini will be contacting your staff soon to schedule a convenient meeting time.

Yours very truly,

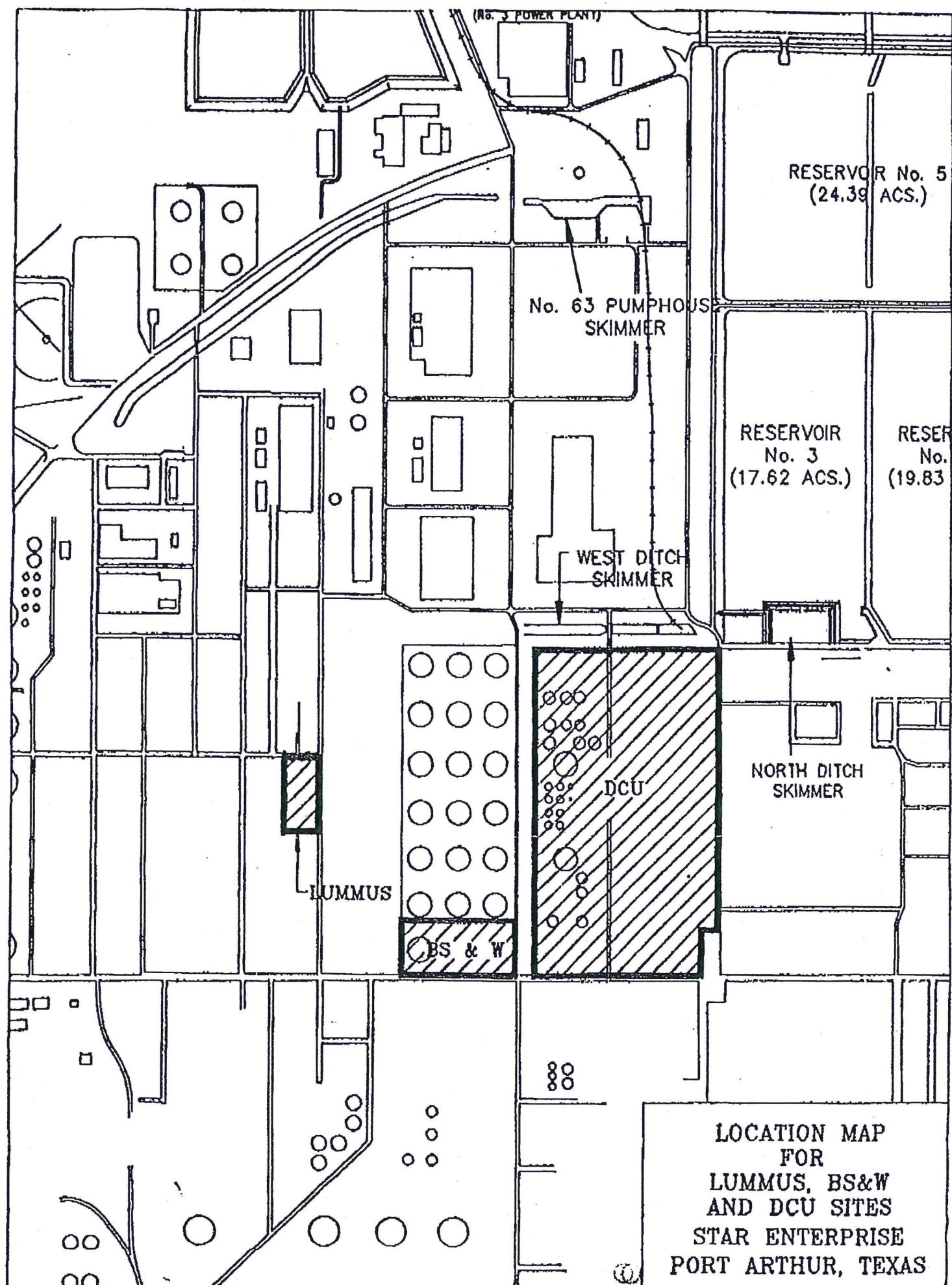
STAR ENTERPRISE

Signed: L. T. TOWNSEND

WBR:JMBs

cc: Mr. Matt Tokheim, EPA Region VI
Mr. David Smith, Head, TWC Hazardous and
Solid Waste Closure Unit
Mr. Leon Byrd, TWC Hazardous and Solid Waste Permits Section

Attachment



TEXAS WATER COMMISSION

What does this
mean?

Bill 3/28

B. J. Wynne, III, Chairman
Paul Hopkins, Commissioner
John O. Houchins, Commissioner



Allen Beinke, Executive Director
Michael E. Field, General Counsel
Brenda W. Foster, Chief Clerk

March 23, 1989

Mr. L. T. Townsend, Manager
Port Arthur Area
Star Enterprise
P. O. Box 712
Port Arthur, Texas 77640-0712

Re: RCRA Facility Investigation (RFI) Workplan
Hazardous Waste Permit No. HW-50188
Industrial Solid Waste Registration No. 30121
EPA I.D. No. TXD 008097529

Dear Mr. Townsend:

Our letter to you dated March 14, 1989 contains inaccurate information. The first sentence in the last paragraph reads as follows:

Please note that Star Enterprise must receive approval both from the Executive Director of the Texas Water Commission and from EPA prior to initiating the RFI.

It should read:

Please note that Star Enterprise must receive approval both from the Executive Director of the Texas Water Commission and from EPA prior to initiating work on the above deficiencies.

If you have questions or comments, please contact Leon Byrd at AC512/463-7977 or Matt Tokheim at EPA, AC214/655-6775.

Sincerely,

Ray Henry Austin

Minor Brooks Hibbs, Chief
Permits Section
Hazardous and Solid Waste Division

CLB:bb

cc: ✓ Sam Becker, EPA - Dallas
Shirley Workman, EPA - Dallas
Matt Tokheim, EPA - Dallas
TWC District 6 Office - Beaumont

TEXAS WATER COMMISSION

Matt
OK?
Bill 3/17

B. J. Wynne, III, Chairman
Paul Hopkins, Commissioner
John O. Houchins, Commissioner



Allen Beinke, Executive Director
Michael E. Field, General Counsel
Brenda W. Foster, Chief Clerk

March 14, 1989

Mr. L. T. Townsend, Manager
Port Arthur Area
Star Enterprise
P. O. Box 712
Port Arthur, Texas 77640-0712

Re: RCRA Facility Investigation (RFI) Workplan
Hazardous Waste Permit No. HW-50188
Industrial Solid Waste Registration No. 30121
EPA I. D. No. TXD 008097529

Dear Mr. Townsend:

The Texas Water Commission and Region VI of the U. S. Environmental Protection Agency (EPA) have reviewed the RFI Workplan submitted August 12, 1988 which discusses the investigative work to be performed at the industrial solid waste management units located at Star Enterprise.

Our evaluation of the RFI Workplan indicates that the proposed activities do not fulfill the requirements of Provision IX.C. of the hazardous waste permit No. HW-50188. This provision requires the submission of a workplan which will determine if a release to the environment of hazardous waste or hazardous constituents has occurred at the subject units. Therefore, we request that within sixty days of the date of this letter you submit the necessary pages for inclusion in the RFI Workplan to address the deficiencies stated below, two copies to TWC and one copy to EPA:

RFI Workplan Section

- 9.3 Where SWMUs are located adjacent to Alligator Bayou or other surface water canals, the dike must be inspected for seeps into the canals. If this cannot be accomplished on foot, a boat should be used.
- 9.6 For any shallow perched transmissive zones encountered during drilling, a method for sampling the fluid encountered should be submitted. For any borings that will pass through one of these shallow zones and the underlying aquitard, the workplan should describe the measures to be taken to prevent cross contamination.

Mr. L. T. Townsend

Page 2

March 14, 1989

9.61 All boreholes not completed as monitor wells should be filled with a grout which is at least one order of magnitude less permeable than the surrounding media.

9.10 Permeability should be determined on the upper clay at the facility. At least one sample from each boring should be tested for permeability.

11.2 The workplan must contain geologic logs which correspond to construction diagrams for all existing monitor wells to be used for the RFI investigation.

Appendix B -- Data submitted in the RFI report should include cross-sections showing the elevations of the bottoms of SWMUs in relation to all transmissive zones encountered in the soil borings.

Appendix D -- Based on the results of the proposed soil borings, additional monitor wells may be needed. Spacing for several of the proposed wells appears to be as much as 900 feet but 500 feet appears to be more appropriate.

Please note that Star Enterprise must receive approval both from the Executive Director of the Texas Water Commission and from EPA prior to initiating the RFI. Further evaluation of your RFI Workplan will continue upon receipt of your response to this request. If you have questions or comments, please contact Leon Byrd at AC512/463-7977 or Matt Tokheim at EPA, AC214/655-6775.

Sincerely,



Minor Brooks Hibbs, Chief
Permits Section
Hazardous and Solid Waste Division

CLB:lab

cc: Matt Tokheim, EPA Region VI Office - Dallas
Shirley Workman, EPA Region VI Office - Dallas
✓ Sam Becker, Chief, EPA RCRA Permits Branch - Dallas
TWC District 6 Office - Beaumont

TEXAS WATER COMMISSION

B. J. Wynne, III, Chairman
Paul Hopkins, Commissioner
John O. Houchins, Commissioner



1989 FEB 14
Allen Beinke, Executive Director
Michael E. Field, General Counsel
Brenda W. Foster, Chief Clerk

Matt
Do we need to
do something?
Bill 2/1

February 14, 1989

TRANSFER OF TEXAS WATER COMMISSION PERMIT NO. HW-50188
FROM TEXACO REFINING AND MARKETING INC.
TO STAR ENTERPRISE

Ownership of the facilities covered by the above-referenced permit, approved June 28, 1988, has changed. That part of the signature page pertaining to the name and mailing address of the permit holder is hereby changed so that the same shall hereinafter be and read as follows:

Name of Permittee: STAR Enterprise
P.O. Box 712
Port Arthur, Texas 77640

Site Owner: STAR Enterprise
1270 Northborough Drive
Houston, Texas 77067

Registered Agent for Service: Clydia J. Cuykendall
1270 Northborough Drive
Houston, Texas 77067

Hazardous Waste Permit No. HW-50188 is hereby corrected as follows:

Pages 2 of 49 through 49 of 49 Texaco Refining and Marketing Inc. changed to STAR Enterprise.

The transferee is financially responsible for the proper maintenance and operation of the facility so as to comply with the terms and conditions of the permit. The failure to operate the facility in accordance with the terms and conditions of the permit may be good cause for revocation of the permit.

The parties identified in the partnership agreement December 22, 1988, a copy of which was filed with the Executive Director of the Texas Water Commission on December 27, 1988, are jointly and severally liable for compliance with the terms and conditions of the permit. The permittee shall file with the Executive Director of the Commission a copy of all future revisions or amendments to the partnership agreement.

This transfer is APPROVED, ISSUED AND EFFECTIVE this 16th day of February, 1989, in accordance with 31 Texas Administrative Code, Section 305.97.

(Seal)

A handwritten signature in dark ink, appearing to read "B. J. Wynne, III", is written over a horizontal line.

B. J. Wynne, III, Chairman
Texas Water Commission



Permit No. HW-50188

RPA I.D. No. TXD 008097529

TEXAS WATER COMMISSION
Stephen F. Austin State Office Building
Austin, Texas

PERMIT FOR INDUSTRIAL
SOLID WASTE MANAGEMENT SITE
issued under provisions of TEX.
REV. CIV. STAT. ANN. art. 4477-7

Name of Permittee:

STAR Enterprise
P. O. Box 712
Port Arthur, Texas 77640

Site Owner:

STAR Enterprise
1270 Northborough Drive
Houston, Texas 77067

Registered Agent for Service:

Cydia J. Cuykendall
1270 Northborough Drive
Houston, Texas 77067

Classification of Site:

Hazardous Waste Processing, Storage, and
Disposal - Non-commercial

The permittee is authorized to process, store, and dispose of wastes in accordance with limitations, requirements and other conditions set forth herein. This permit is granted subject to the rules of the Commission and other Orders of the Commission and laws of the State of Texas. Nothing in this permit exempts the permittee from compliance with the applicable rules and regulations of the Texas Air Control Board.

This permit will be valid until cancelled, amended or revoked by the Commission, except that the authorization to process and dispose of wastes shall expire midnight, ten years after the date of permit approval.

All permit provisions in this permit stem from state authority. Those provisions marked with an asterisk (*) stem from both state and federal authority.

APPROVED, ISSUED, AND EFFECTIVE this 15th day of March, 1988

ATTEST

Karen A. Phillips Rene H. Hopkins
For the Commission

* It is within the discretion of an administrative agency to relax or modify its procedural rules. American Farm Lines v. Black Ball Freight Service, 397 U.S. 532, 90 S.Ct. 1288, 25 L.Ed. 2d 547 (1970); National Labor Relations Board v. Monsanto Chemical Company, 205 F. 2d 763, 764 (8th Cir. 1953); Neighborhood TV Co., Inc. v. F.C.C., 742 F. 2d 629 (D.C. Cir. 1984). It can even be unlawful for an agency to refuse to waive a procedural rule. Health Systems Agency v. Norman, 589 F. 2d 486 (10th Cir. 1978). The Environmental Protection Agency has, in fact, upon request waived the 90 day prior notice rule for transfer of interim status under RCRA, so there is agency, as well as judicial, precedent for such waivers.

AUTHORIZATION TO OPERATE UNDER THE
RESOURCE CONSERVATION AND RECOVERY ACT

In compliance with the Resource Conservation and Recovery Act (RCRA), as amended,

STAR Enterprise
P.O. Box 712
Port Arthur, Texas 77640

is authorized to dispose of hazardous waste in accordance with the limitations, requirements and other conditions set forth herein at a facility located in Jefferson, County, Port Arthur, Texas. (North Latitude 29°53'14" West Longitude 93°58'42").

This is a joint permit issued by the Texas Water Commission (TWC) and the Environmental Protection Agency (EPA) and is issued, in part, pursuant to the provisions of Section 206, 212, and 224 of the Hazardous and Solid Waste Amendments of 1984 (HSWA) which modified Sections 3004 and 3005 of the RCRA. The provisions in this permit marked with an asterisk (*) stem from the HSWA and are hereby issued under Federal authority. Any notification or report sent to TWC required under Provisions VI.AA through FF and IX of this permit shall also be sent to the Director of the Hazardous Waste Management Division, EPA, Region 6. Provisions VI.A through FF and IX are subject to review and approval by both EPA and TWC.

This permit is based on the assumption that all information contained in the permit application is accurate and that the facility will be constructed and operated as specified in the permit application. The permit application consists of all information regarding this facility submitted November 7, 1985; and as revised by submittal of February 10, 1986, June 22, 1987, and October 5, 1987, to the Texas Water Commission (TWC). The permit may be modified, revoked and reissued, or terminated for cause including any inaccuracies found in the permit application (see 40 C.F.R. §§270.41, 270.42, and 270.43).

Those permit provisions written under the above cited Federal authority shall be effective on June 17, 1988 and shall expire at midnight on March 15, 1998.

Issued this 17 day of June, 1988.

by Jack L. Davis
for Allyn M. Davis, Director
Hazardous Waste Management Division



Texaco

RECEIVED
EPA REGION VI

88 DEC -2 AM
HAZARDOUS WASTE

RECEIVED
EPA REGION VI

1988 DEC -1 PM 2:09

OFFICE
ADMINISTRATION

Regional Administrator
U. S. Environmental Protection Agency
Region VI

Attention: Mr. Robert Layton, Jr.

Re: RCRA Permits

Dear Mr. Layton:

Effective December 31, 1988 Texaco Refining and Marketing Inc. (Texaco) will transfer to STAR Enterprise (STAR), a partnership, certain industrial facilities with hazardous waste facilities having the following federally issued RCRA permits and/or ID numbers:

EPA ID No. TXD 008097529
EPA ID No. TXD 980626022
Permit No. HW-50188

Port Arthur
D

Revised permits forms in the name of STAR Enterprise are enclosed. Please modify these permits under 40 C.F.R. Section 270.40 to reflect this transfer and show the permittee as STAR Enterprise, rather than Texaco Refining and Marketing Inc.

Lastly, it is also requested that Region VI waive the requirement of 40 C.F.R. Section 270.40 that this submission be made no later than 90 days prior to the scheduled change of ownership.*

Sincerely,

STAR Enterprise

M. J. Killien
Manager - Port Arthur (Area) - Acting
P. O. Box 712, Port Arthur, Texas 77641-0712

Enclosures

TEXAS WATER COMMISSION

Matt

B. J. Wynne, III, Chairman
Paul Hopkins, Commissioner
John O. Houchins, Commissioner



Allen Beinke, Executive Director
Michael E. Field, General Counsel
Brenda W. Foster, Chief Clerk

TRANSFER OF TEXAS WATER COMMISSION PERMIT NO. 01172
FROM TEXACO REFINING AND MARKETING INC.
TO STAR ENTERPRISE

Ownership of the facilities covered by the above-referenced permit, approved November 18, 1986, has changed. That part of the signature page pertaining to the name and mailing address of the permit holder is hereby changed so that the same shall hereinafter be and read as follows:

"Star Enterprise
P. O. Box 21169
Houston, Texas 77226"

The transferee is financially responsible for the proper maintenance and operation of the facility so as to comply with the terms and conditions of the permit. The failure to operate the facility in accordance with the terms and conditions of the permit may be good cause for revocation of the permit.

This transfer is APPROVED and ISSUED this 30th day of December 1988, and EFFECTIVE the 31st day of December 1988, in accordance with 31 Texas Administrative Code Section 305.97.

A handwritten signature in cursive script that reads "Brenda W. Foster".

Brenda Foster, Chief Clerk
Texas Water Commission

TEXAS WATER COMMISSION

B. J. Wynne, III, Chairman
 Paul Hopkins, Commissioner
 John O. Houchins, Commissioner



Allen Beinke, Executive Director
 Michael E. Field, General Counsel
 Brenda W. Foster, Chief Clerk

February 1, 1989

Handwritten signature/initials

Mr. L. T. Townsend, Plant Manager
 Texaco Refining and Marketing
 Port Arthur Refinery
 P.O. Box 712
 Port Arthur, Texas 77642

TXD008097529

Re: Texaco Refining and Marketing - Port Arthur Refinery
 Hazardous Waste Permit No. HW-50188, Solid Waste Registration No. 30121,
 Notice of Solid Waste Violations

Dear Mr. Townsend:

On December 29, 1988, and January 5, 10, and 11, 1989, Kelly Hargraves and Cliff Wenzel of the Texas Water Commission (TWC) District 6 office conducted an inspection of the above referenced facility to determine compliance with the Commission Rules pertaining to solid waste management. During the inspection, conditions were observed and documented that we believe constitutes noncompliance with the solid waste rules. The following areas of alleged noncompliance were observed.

1. Permit No. HW-50188 Permit Provision VI.K.3.b/40 CFR 264.15(d) General Inspection Requirements. Inspection logs identified the inspector by initials only. Incessant use of ditto marks to identify the time of inspection, the "initials" of the inspector, notations of observations made, and repairs and/or remedial actions taken.
2. 31 TAC 335.152/40CFR 264.53(b) Copies of Contingency Plan. Texaco has not submitted copies of their Contingency Plan to all state and local emergency response teams that may be called upon to provide emergency services.
3. 31 TAC 335.10, .61 Shipping and Reporting Procedures. During the inspection, the following manifest discrepancies were noted:
 - a. Texaco failed to properly identify the correct waste classification code assigned to waste shipped on two separate occasions:
 - i. Louisiana Manifest No. 1016917, and
 - ii. Louisiana Manifest Nos. 1016914 and 1016915
 - b. Texaco failed to receive properly completed manifests on two separate occasions:
 - i. Transporter failed to date manifest No. 00333186 acknowledging acceptance of waste from the generator, and
 - ii. Disposal facility failed to date manifest No. 00333192 to certify the acceptance of waste.

REPLY TO: DISTRICT 6 / P.O. BOX 6328 / BEAUMONT, TEXAS 77705-0328 / AREA CODE 409/842-9413

Mr. L. T. Townsend
Texaco Refining and Marketing
Page 2
February 1, 1988

4. 31 TAC 335.9, Permit Provision VIIA.5, 40 CFR 264.73 Recordkeeping and Annual Reporting Procedures, Operating Record. Several records indicating hazardous waste and industrial solid waste activities were not available for review in order to determine compliance with solid waste rules.
5. 31 TAC 335.6 Notification Requirements. Notification has not been provided to the Executive Director for the following items:
 - a. Waste No. 073 needs to be removed from the land treatment facility.
 - b. Waste No. 076 needs to be changed from nonhazardous to hazardous.
 - c. Waste No. 080 needs to be changed to "cloth media."
 - d. Waste No. 053 should not be listed as "No longer generated." Land treatment records reflect treatment of this waste.
 - e. The storage area for PCB containing transformers needs to be added, and
 - f. The machine shop should be listed as a satellite accumulation area.
6. 31 TAC 335.163 General Groundwater Monitoring Requirements. Groundwater surface elevations have not been evaluated annually to determine properly placed monitoring wells.

Concerning these alleged noncompliances, we request your response in writing with a schedule for corrective actions within 30 days from the date of this letter. We also request that you advise us of any corrective action which you have taken. If you have any question regarding this matter, please feel free to contact Kelly Hargraves of the TWC District 6 office at (409) 842-9413.

Sincerely,

Suzanne Meyer for H.D.B.

Harry D. Boudreaux
District Manager

KH:km

cc: Sherry Pierce, Hazardous and Solid Waste Enforcement Section, Austin
Ken Zarker, Reports and Information Management Unit, Hazardous and Solid Waste Division, Austin

StarEnterprise

L T Townsend
Manager
Port Arthur Area



August 5, 1991

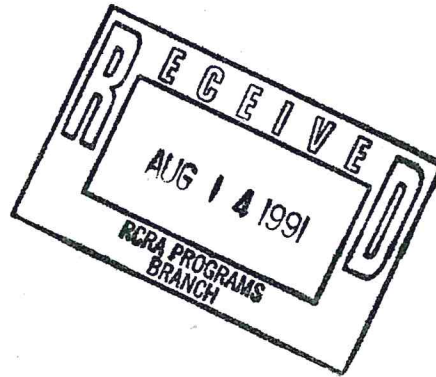
RECEIVED

1991 AUG 20 AM 11:40

EPA
HAZARDOUS
COMPLIANCE

P O Box 712
Port Arthur TX 77641 0712
409 989 7001

Re: Class 3 Permit Modifications
Star Enterprise - Port Arthur Plant
EPA I.D. No. TXD008097529
TWC Permit No. HW-50188-000
ENV 1381, 1310



Mr. Allen Beinke
Executive Director
Texas Water Commission
P. O. Box 13087, Capitol Station
Austin, TX 78711-3087

Attention: Mr. Minor Hibbs, Chief, Permits Section
Hazardous and Solid Waste Division

Dear Mr. Beinke:

Please reference our March 21, 1991 subject letter to you. This letter was the transmittal of the Class 3 Permit Modification which addressed the Toxicity Characteristic (TC) Regulations and it's relationship to our facility.

Pursuant to 31 Texas Administrative Code (TAC), Section 305.69(g) and 40 Code of Federal Regulations (CFR), Section 270.42(g), we have published a notice in the newspaper and mailed notices to the affected landowners as submitted in the subject modification and applicable public officials and agencies. Attached, for your records, is a copy of the affidavit of publication recently received from the Port Arthur News and the notice mailed to the aforementioned parties.

Should questions arise, please contact O. R. Marshall at (409) 989-7166.

Yours very truly,

STAR ENTERPRISE

LT Townsend/wfu

ORM:JMD

cc: ✓ Robert E. Layton, Jr., EPA, Dallas, TX
Keith Anderson, TWC, District VI, Beaumont, TX
Sherry Pierce, ITEX, Dallas, TX
Leon Byrd, TWC, Austin, TX

Attachments

StarEnterprise

L T Townsend
Manager
Port Arthur Area



P O Box 712
Port Arthur TX 77641 0712
409 989 7001

August 5, 1991

Re: Class 1 Permit Modifications
Star Enterprise-Port Arthur Plant
EPA I.D. No. TXD008097529
TWC Permit No. HW-50188-000
ENV 1381, 1310

Mr. Allen Beinke
Executive Director
Texas Water Commission
P. O. Box 13087, Capitol Station
Austin, Texas 78711-3087

Attention: Minor Hibbs, Chief-Permits Section
Hazards & Solid Waste Division

Dear Mr. Beinke:

Please refer to my May 1, 1991 letter to you transmitting Class 1 Permit Modifications as referenced above. The modifications were submitted in accordance with 40 CFR Section 270.42, to enable temporary authorization for operation of two (2) active consolidation/storage facilities, a protective filing on eight (8) consolidation/storage facilities, and the operation of a lined wastewater conveyance system.

As indicated in our May 1 letter, the eight (8) inactive consolidation/storage facilities identified as areas 10, 11, 12, 13, 14, 15, 18 and 19 on the Port Arthur Plant Topographic Map as contained in Attachment A of the Class 1 Permit Modifications did not receive waste (F037 or F038) after May 1, 1991. Since these facilities were inactive prior to May 2, 1991, the effective date of the Primary Sludge Regulation, and additional waste will not be placed in these inactive facilities, we are hereby rescinding the protective filing of these facilities as these facilities will not actively manage hazardous waste in the future. Attached are four copies of revised pages of the subject Class 1 Permit Modification application to replace those pages in the application transmitted to you in my May 1, 1991 letter. We will file a Class 3 Permit Modification by October 29, 1991, and these revisions will also be contained in that permit application filing.

Mr. Allen Beinke
Page 2
August 5, 1991

If additional information is required, please contact Mr. R. L. Korbini
of my staff at (409) 989-7171.

Yours very truly,

STAR ENTERPRISE

L. T. Townsend

RLK:JMDs

cc: Mr. Robert E. Layton, EPA, Dallas, TX
Mr. Keith Anderson, TWC, District VI, Beaumont, TX
Ms. Sherry Pierce, ITEX, Dallas, TX

Enclosures

cc. Mr. Leon Byrd, TWC, Austin, TX

StarEnterprise

L T Townsend
Manager
Port Arthur Area



P O Box 712
Port Arthur TX 77641 0712
409 989 7001

May 2, 1991

HAND DELIVERED

Re: Class 1 Permit Modifications
Star Enterprise - Port Arthur Plant
EPA I.D. No. TXD008097529
TWC Permit No. HW-50188-000
ENV 1381, 1310

Mr. Robert Layton
Regional Administrator, Region VI
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, TX 75202-2733

Dear Mr. Layton:

Star Enterprise is hereby transmitting the Class 1 permit modification request referenced above. This includes revisions to the RCRA Part A permit for our refinery located in Port Arthur, Texas. Enclosed are one copy and a formal transmittal letter. The signature of your staff below acknowledges receipt of this package.

Yours very truly,

STAR ENTERPRISE

L. T. Townsend

ORM:JMBs

Received

Name EPA
Environmental Protection Agency
Signature W. A. H. [Signature]
Date 5-2-91

L T Townsend
Manager
Port Arthur Area



P O Box 712
Port Arthur TX 77641 0712
409 989 7001

May 1, 1991

Re: Class 1 Permit Modifications
Star Enterprise - Port Arthur Plant
EPA I.D. No. TXD008097529
TWC Permit No. HW-50188-000
ENV 1381, 1310

Mr. Robert Layton
Regional Administrator, Region VI
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, TX 75202-2733

Dear Mr. Layton:

Please find enclosed one copy of the Class 1 permit modification request referenced above. These modifications have been submitted in accordance with 40 CFR Section 270.42, to enable temporary authorization for operation of two(2) active consolidation/storage facilities, a protective filing for eight(8) consolidation/storage facilities, and the operation of a lined wastewater conveyance system. In addition, this amends our previous submissions of September 24, 1990 (Class 1 Permit Modifications - Toxicity Characteristics Leaching Procedure) and March 21, 1991 (Class 3 Permit Modification) to indicate that the Minimum Technology Requirement (MTR) surface impoundments will be used for settling solids which may be considered primary or secondary (F037 and F038) sludges.

The active consolidation/storage facilities have been constructed within the confines of the existing wastewater impoundment at the facility. Materials meeting the description of the listed primary or secondary wastes (F037 or F038), generated prior to May 2, 1991, from several locations will continue to be placed into this facility after May 2, 1991.

Mr. Robert Layton

Page 2

May 1, 1991

The other eight(8) consolidation/storage facilities received materials meeting the description of the listed primary or secondary wastes (F037 or F038) generated before May 2, 1991. We are submitting a protective filing in case the facilities become active in the future. No waste will be placed in these facilities after May 2, 1991.

The facility wastewater conveyance system is lined and incorporates an underdrain collection system. This system will be used to manage facility wastewater streams which may generate sludges which would be considered primary and secondary (F037 and F038) sludges.

Star Enterprise will prepare the required Class 3 Part B Permit Modifications within 180 days of the effective date of this new regulation.

If additional information is required, contact O. R. Marshall at (409) 989-7166.

Yours very truly,

STAR ENTERPRISE

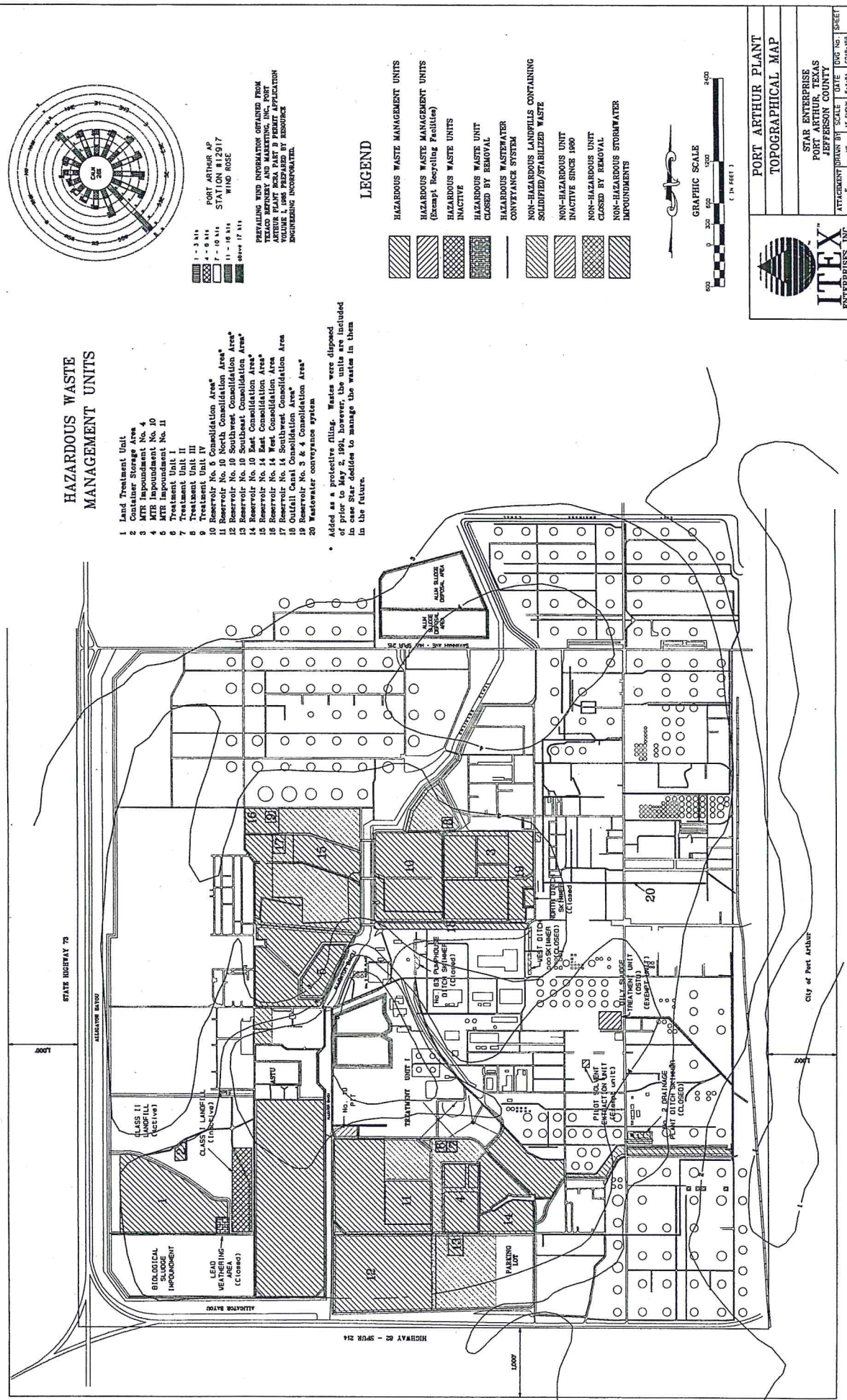
L. T. Townsend

ORM:JMBs

cc: Mr. Allen Beinke, TWC, Austin, TX
Mr. Keith Anderson, TWC, District VI, Beaumont, TX

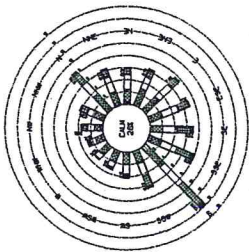
Enclosures

cc: Sherry Pierce, ITEX, Dallas, TX
Leon Byrd, TWC, Austin, TX



HAZARDOUS WASTE MANAGEMENT UNITS

- 1 Land Treatment Unit
- 2 Consolidation Storage Area
- 3 MTR Impoundment No. 4
- 4 MTR Impoundment No. 10
- 5 MTR Impoundment No. 11
- 6 Treatment Unit I
- 7 Treatment Unit II
- 8 Treatment Unit III
- 9 Treatment Unit IV
- 10 Reservoir No. 5 Consolidation Area*
- 11 Reservoir No. 10 North Consolidation Area*
- 12 Reservoir No. 10 Southeast Consolidation Area*
- 13 Reservoir No. 10 East Consolidation Area*
- 14 Reservoir No. 14 West Consolidation Area*
- 15 Reservoir No. 14 Southeast Consolidation Area*
- 16 Reservoir No. 14 Southwest Consolidation Area*
- 17 Outfall Canal Consolidation Area*
- 18 Reservoir No. 3 & 4 Consolidation Area*
- 19 Wastewater conveyance system
- 20 Added as a protective lining. Wastes were disposed prior to the addition of this unit. It is included in the Star decision to manage the wastes in them in the future.

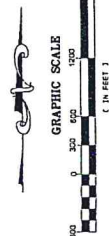


PORT ARTHUR AP
STATION 812917
WIND ROSE

PREVAILING WIND INFORMATION OBTAINED FROM
TEACO REFINERY AND MARKETING, INC., PORT
ARTHUR PLANT AREA PART 3 PERMIT APPLICATION
SUBMITTED TO THE STATE OF TEXAS
ENGINEERING INCORPORATED.

LEGEND

	HAZARDOUS WASTE MANAGEMENT UNITS
	HAZARDOUS WASTE MANAGEMENT UNITS (Exempt Recycling Facilities)
	HAZARDOUS WASTE UNITS
	HAZARDOUS WASTE UNIT CLOSED BY REMOVAL
	HAZARDOUS WASTEWATER CONVEYANCE SYSTEM
	NON-HAZARDOUS LANDFILLS CONTAINING SOLIDIFIED/STABILIZED WASTE
	NON-HAZARDOUS UNIT INACTIVE SINCE 1980
	NON-HAZARDOUS UNIT CLOSED BY REMOVAL
	NON-HAZARDOUS STORMWATER IMPOUNDMENTS



PORT ARTHUR PLANT
TOPOGRAPHICAL MAP

STAR ENTERPRISE
PORT ARTHUR, TEXAS
JEFFERSON COUNTY

ATTACHMENT NUMBER 81
DATE 10-1-80
SHEET 1 OF 1

1. ~~Rob~~
2. Rich

AUG 3 1987

MEMORANDUM

Subject: Transmittal of Visual Site Inspection Oversight Evaluation Sheets

From: Jon G. Winhart, Geologist
Technical Section (GH-CT)

To: Erlece P. Allen, Chief
Technical Section (GH-CT)

Attached please find a copy of the following Visual Site Inspection Oversight Evaluation Sheets:

- * Facility Name: Texaco Refinery
- * EPA ID Number: TX0000057629

Please advise us if more information is required and/or if you need further assistance.

Attachment

cc: Sam Becker (GH-C)

bcc: B. Parr (GH-HS)
G. Reiter (GH-HO)
B. Honker (GH-CP) ✓
E. Lethans (GH-CT)

GH-CT:Rinchart:tlc15-5790:Disk #1:FILE CODE:II.2.1.0031

GH-CT GH-CT
Boada Allen

OVERSIGHT EVALUATION
SHEET FOR VISUAL SIGHT INSPECTION

LEAD: Contractor or State: Texas Texas Water Commission

FACILITY NAME: Texaco Refinery

EPA ID #: TXD008097529 LOCATION: Port Arthur

VISUAL SIGHT INSPECTION DATE(s): June 21, 22, and 23, 1987

LEAD NAME(s): Allan Posnick (Orange) Dist. 6 PHONE #: (409) 883-2973

Sherry Pierce, Leon Bird (Austin) (512) 463-8425

EPA PERSONNEL NAME(s): Jon Rinehart PHONE #: (214) 655-6790

Greg Uetrecht (1st Day) (214) 655-6790

FACILITY PERSONNEL NAME(s): George Mays PHONE #: (409) 989-7268
Environmental Staff - Eng.

Odessa Mitchell-Environmental Senior - Eng (409) 989-7166
Ron Korbini-Manager of Environmental Division

QUESTIONS/COMMENTS:

- I: Was an entrance interview held with the facility adequately to outline the overall RCRA Facility Assessment (RFA) process and to organize the scope of the Visual Sight Inspection (VSI)?

COMMENT:

Yes. Allan Posnick, who is a field inspector for TWC conducted
the entrance interview. He explained the scope of RFA and the
VSI. He also discussed the SIMUS and the need for personnel,
who were familiar with the processes to be present during the
inspection.

- II. Did the Lead Person(s) use a Preliminary Review (PR) or a list of SWMUs already prepared for this VSI?

Yes X No

Comment:

The lead person used a Preliminary Review and maps which located the SWMUs. These were used extensively during the VSI.

- III. Did the Lead Person(s) discuss each SWMU with the facility personnel for its likelihood of a release, its associated waste characteristics, and any other unit specific questions during the VSI? (Explain)

Leon Bird, who is the permit writer from TWC and Allan Posnick, who is the field inspector, discussed all of the SWMUs with the facility personnel and the likelihood of release along with the characteristic waste.

- IV. Were all the SWMUs identified to the best of your knowledge? (Explain)

I believe all SWMUs were identified. I was not present on the 24th of June, therefore I can not comment on the investigations during that day.

- V. Were additional SWMUs identified during the VSI? (Comment)

The areas around the cooling towers were identified as SWMUs which were not listed in the PR.

- VI. Did the Lead Person(s) discuss and follow the facility's safety procedures? (Comment)

The facility's safety procedure was discussed at the entrance
interview and adhered to during the VSI.

- VII. Did the Lead Person(s) verify each SMHU by taking a photograph with a 35 mm camera? (Comment)

Photographs were taken at some of the SMHUs with a 35mm camera.

- VIII. Did the Lead Person(s) conduct an exit interview to discuss the overall approach of the finding during the VSI? (Explain)

The last day of the VSI was June 24, at that time I was already
back in Dallas, therefore I was not present for the exit interview.
Allan Posnick returned on Monday June 28, 1987 to sample some of
the units but a formal exit interview was not conducted.

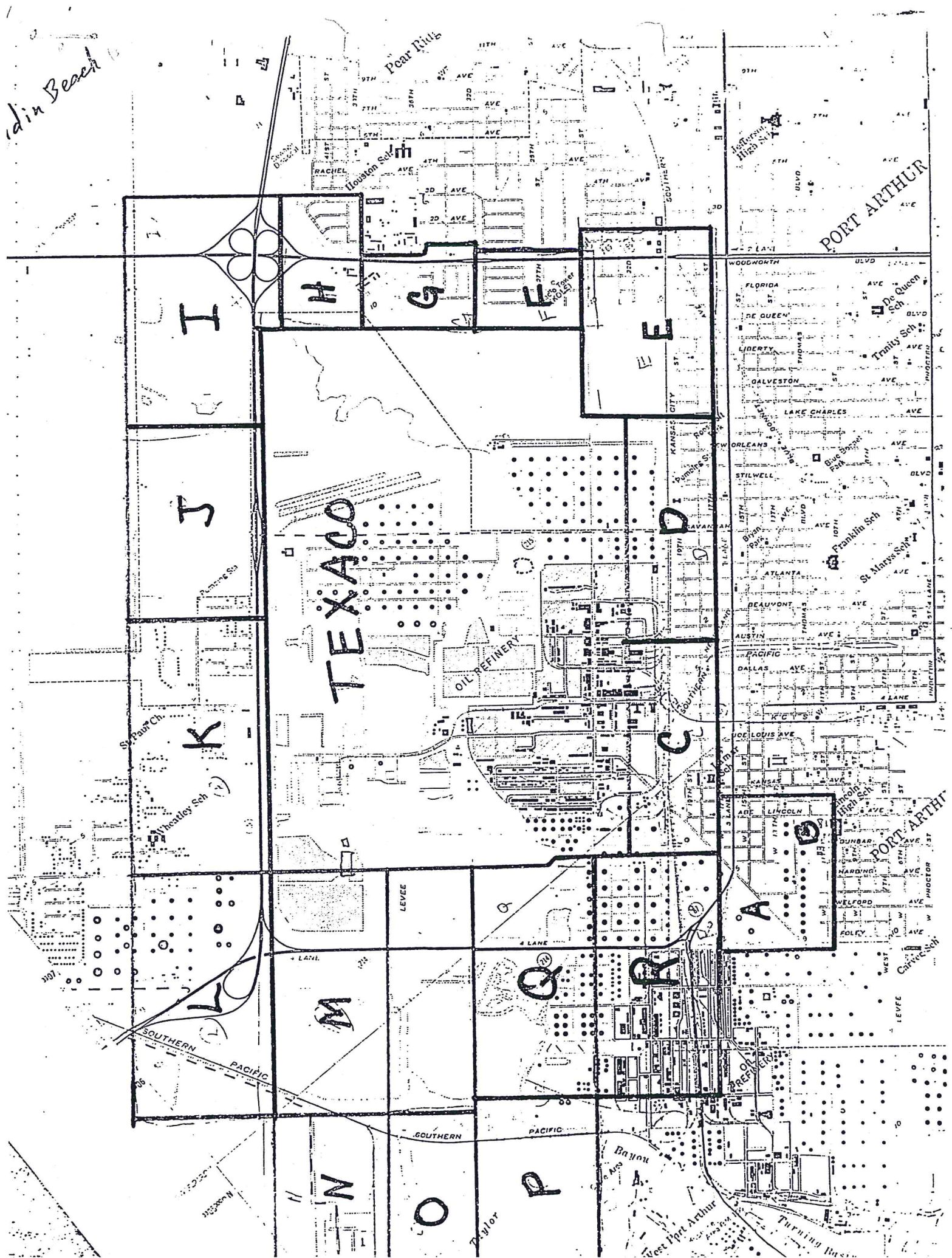
- IX. Was the Lead Person(s) adequately prepared to perform the VSI? (Comment)

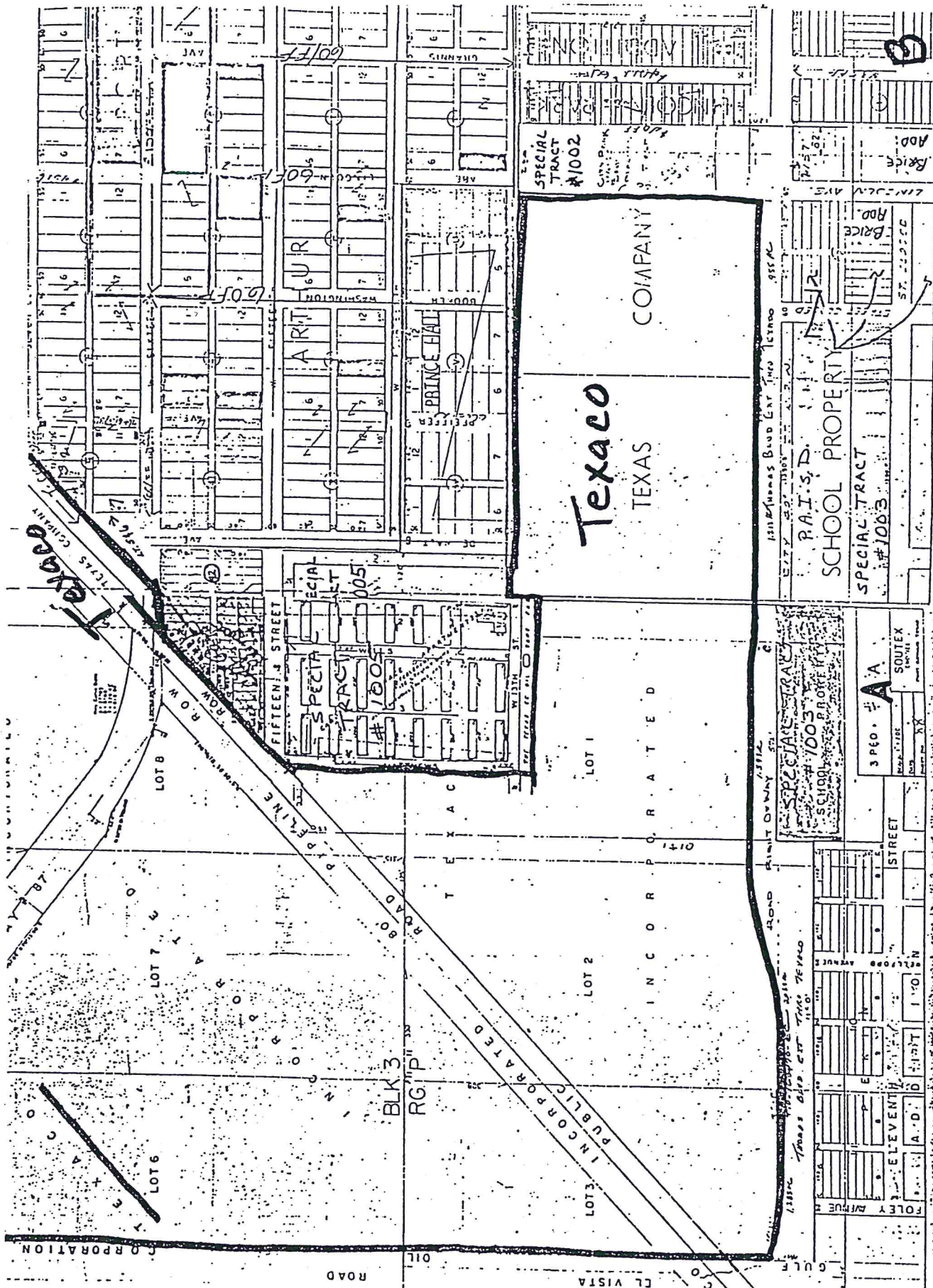
I think Allan Posnick was very well prepared to perform the VSI.

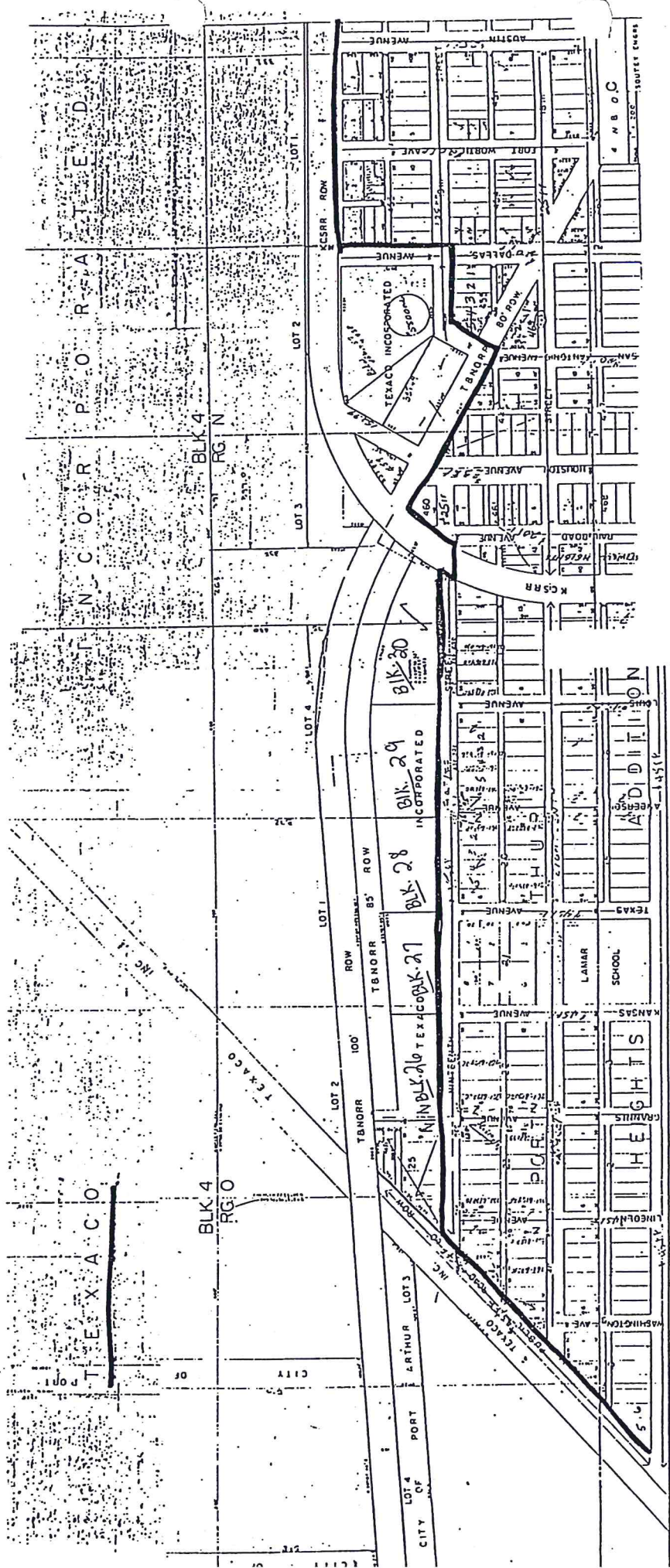
- X. Any additional comments or concerns that should be noted at this time? (Comment)

There was a problem with the numbering system used on the TWC
registration list and the list in the Part B. The numbering system
did not correspond to each other.

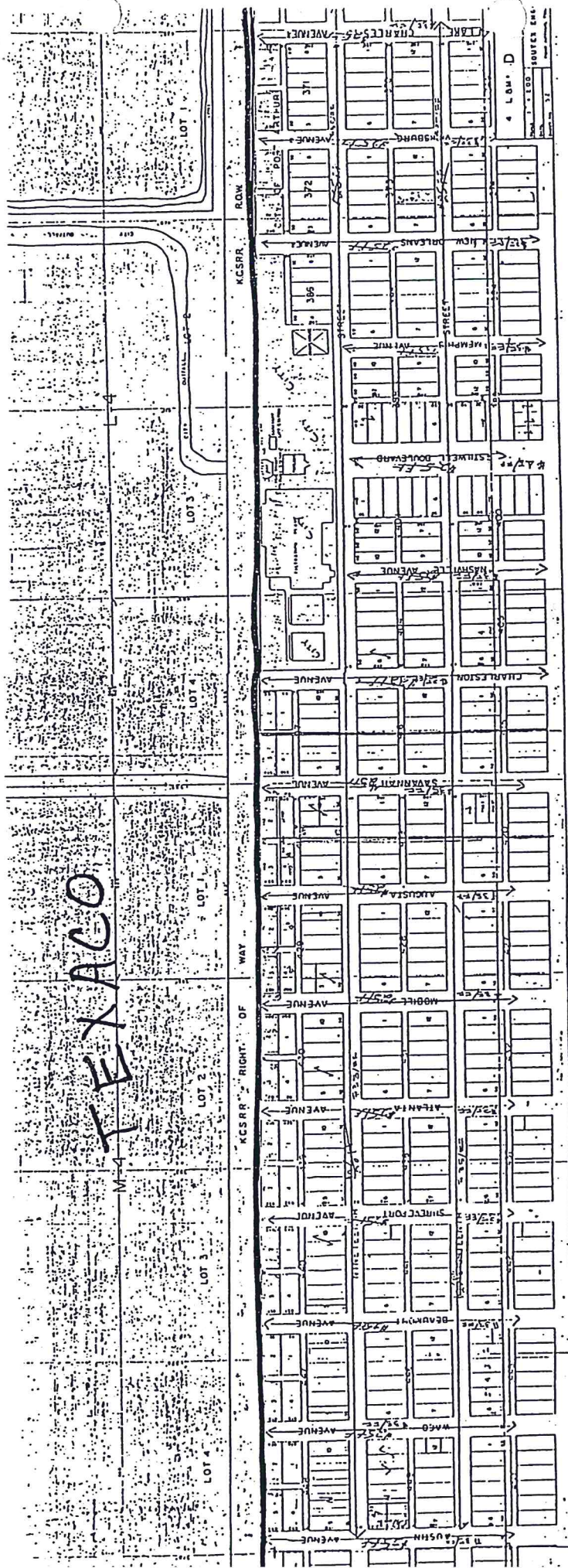
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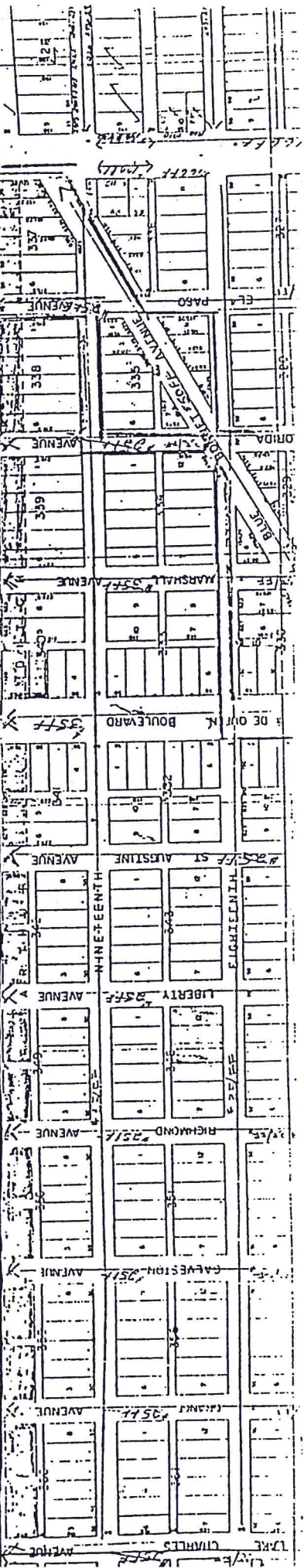
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LOT 3

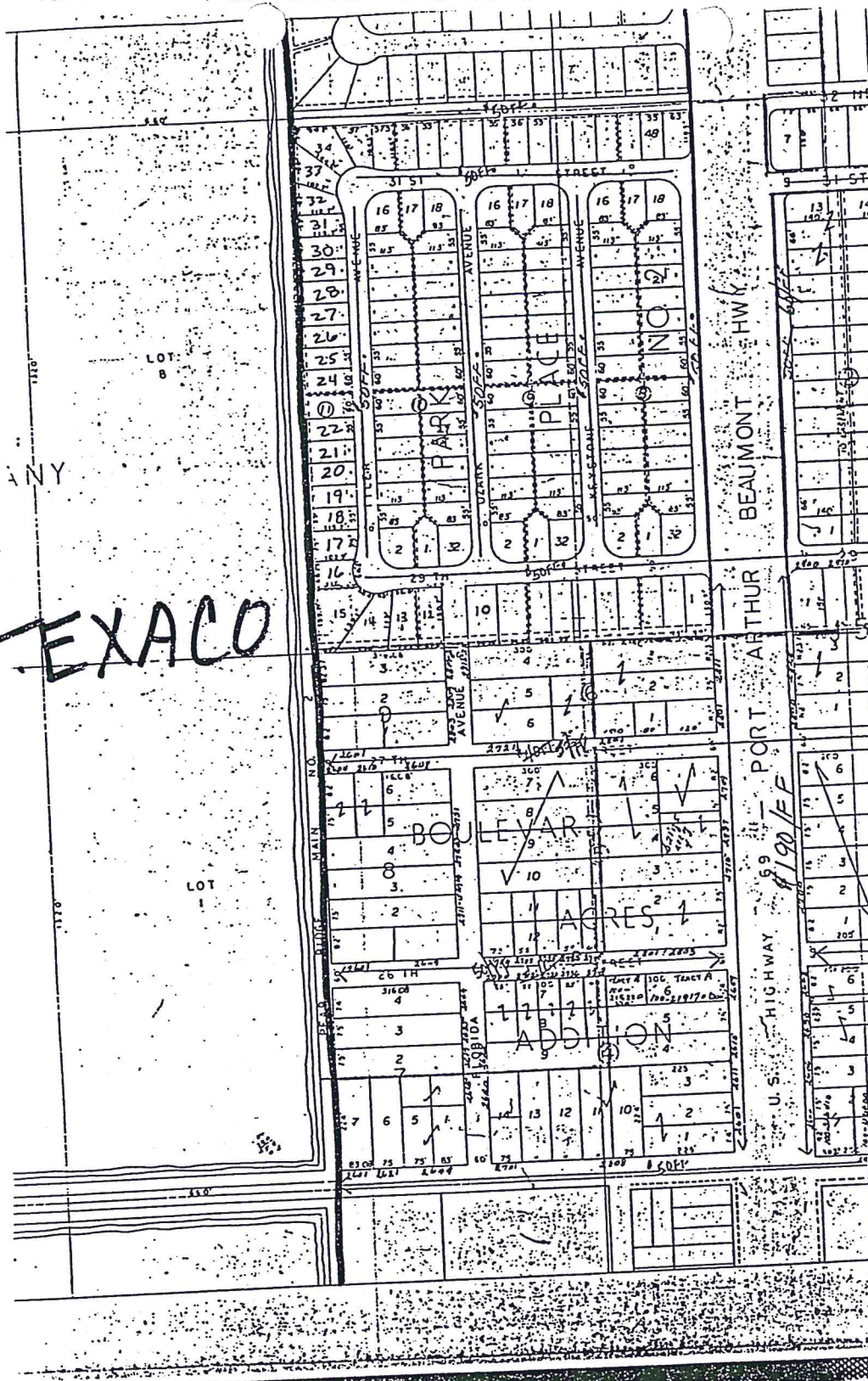
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LOT 1

KCS RAILROAD RIGHT OF WAY



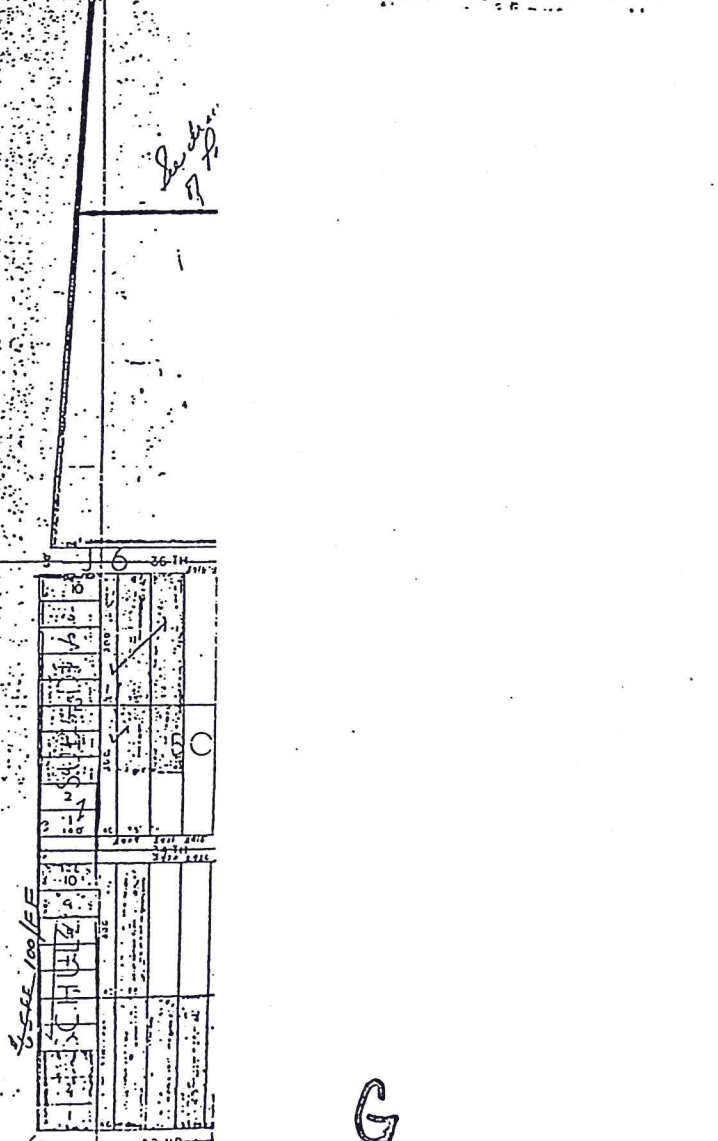
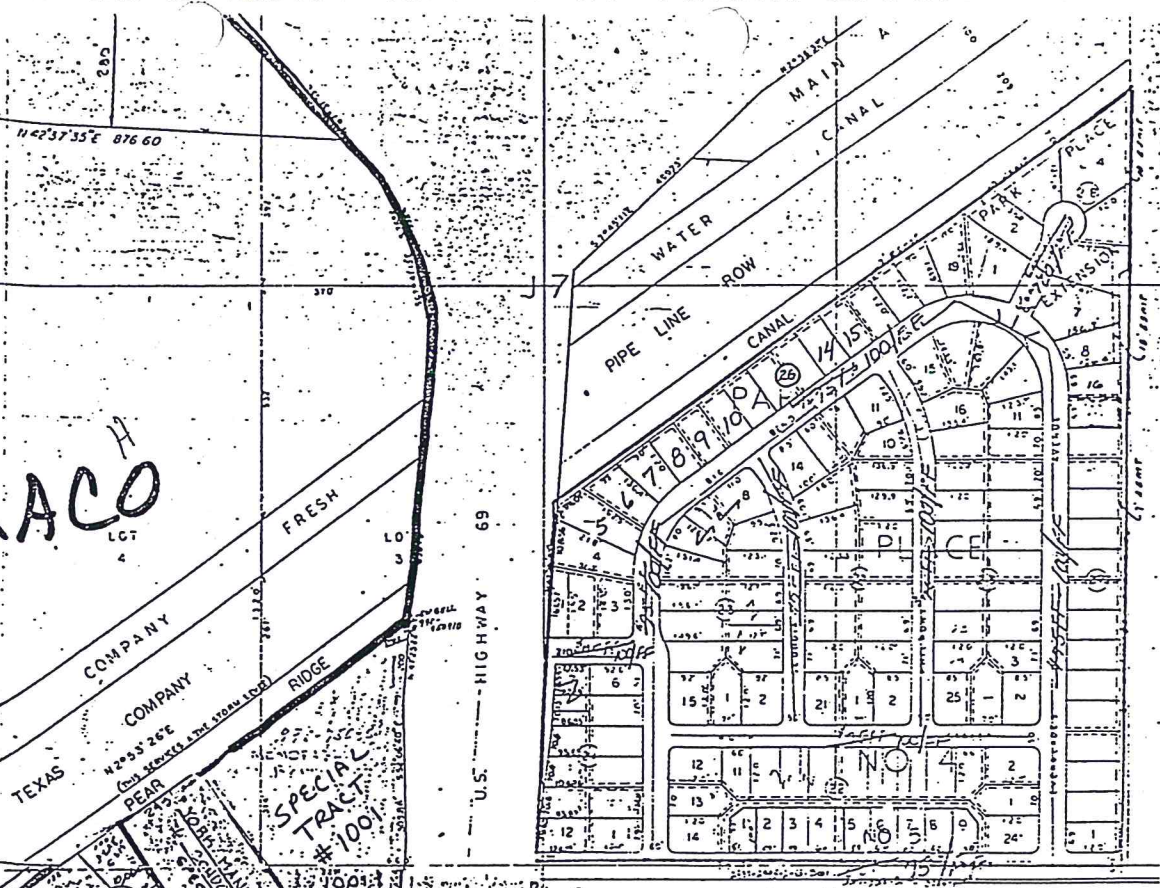
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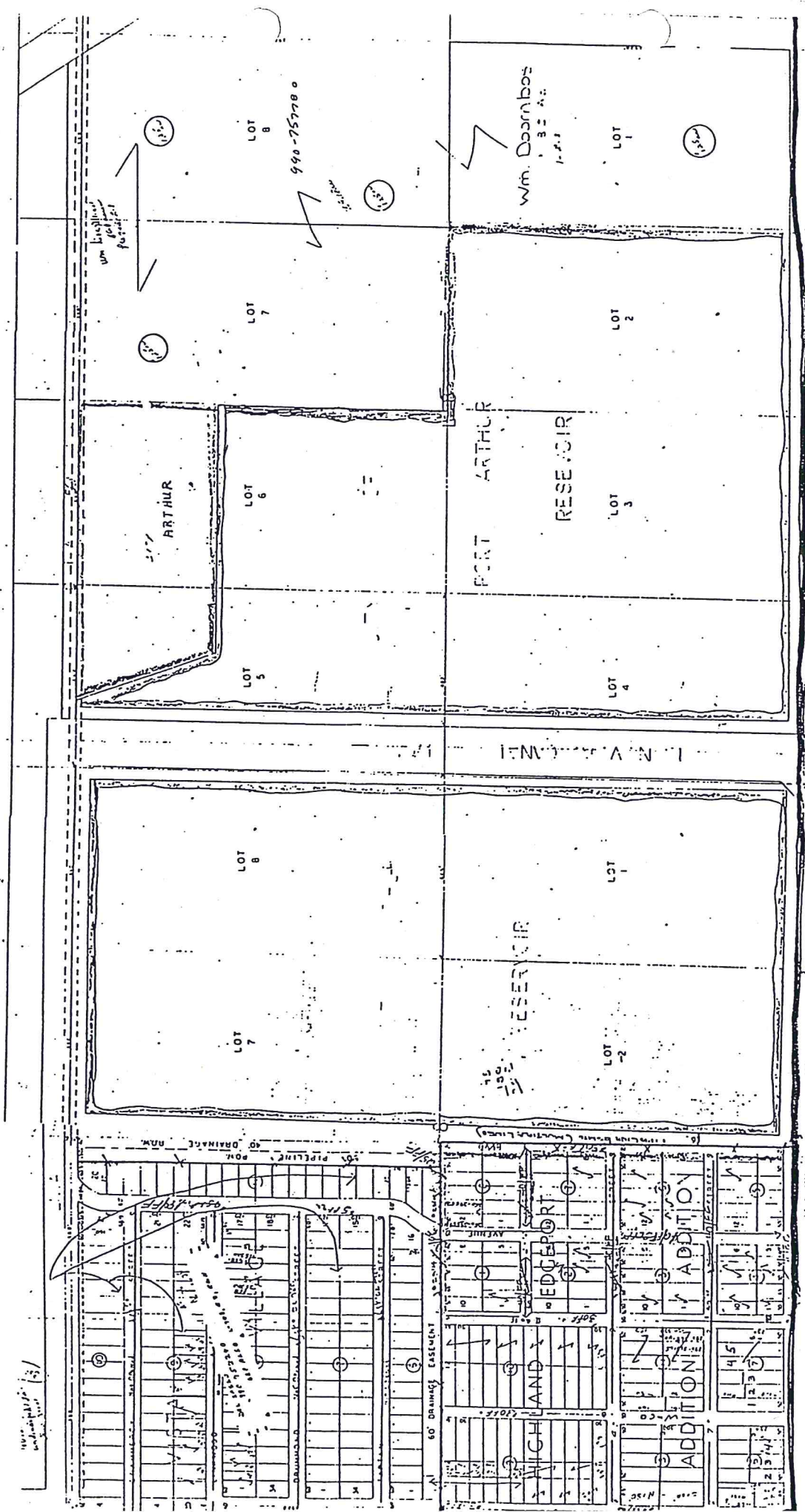
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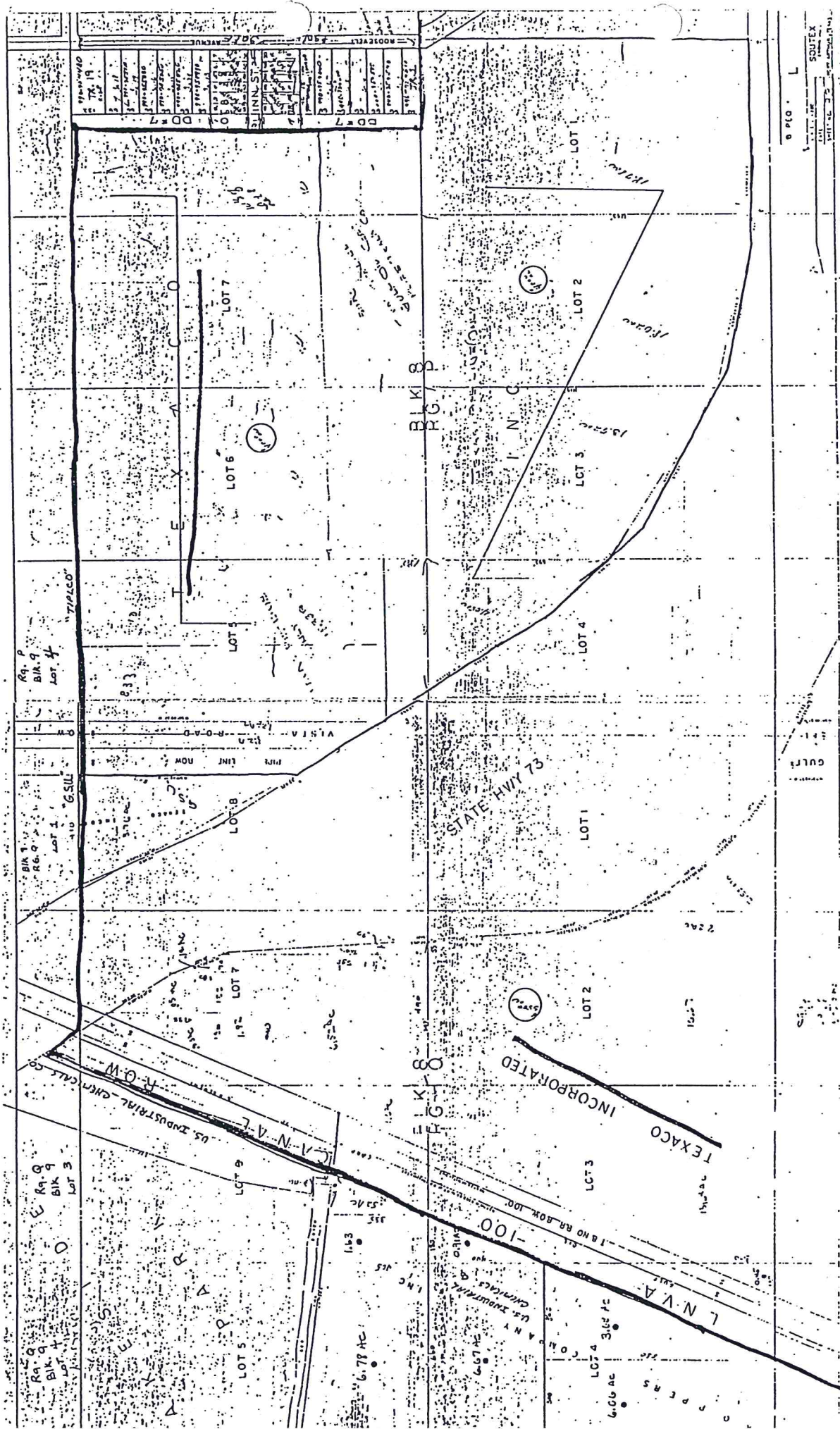
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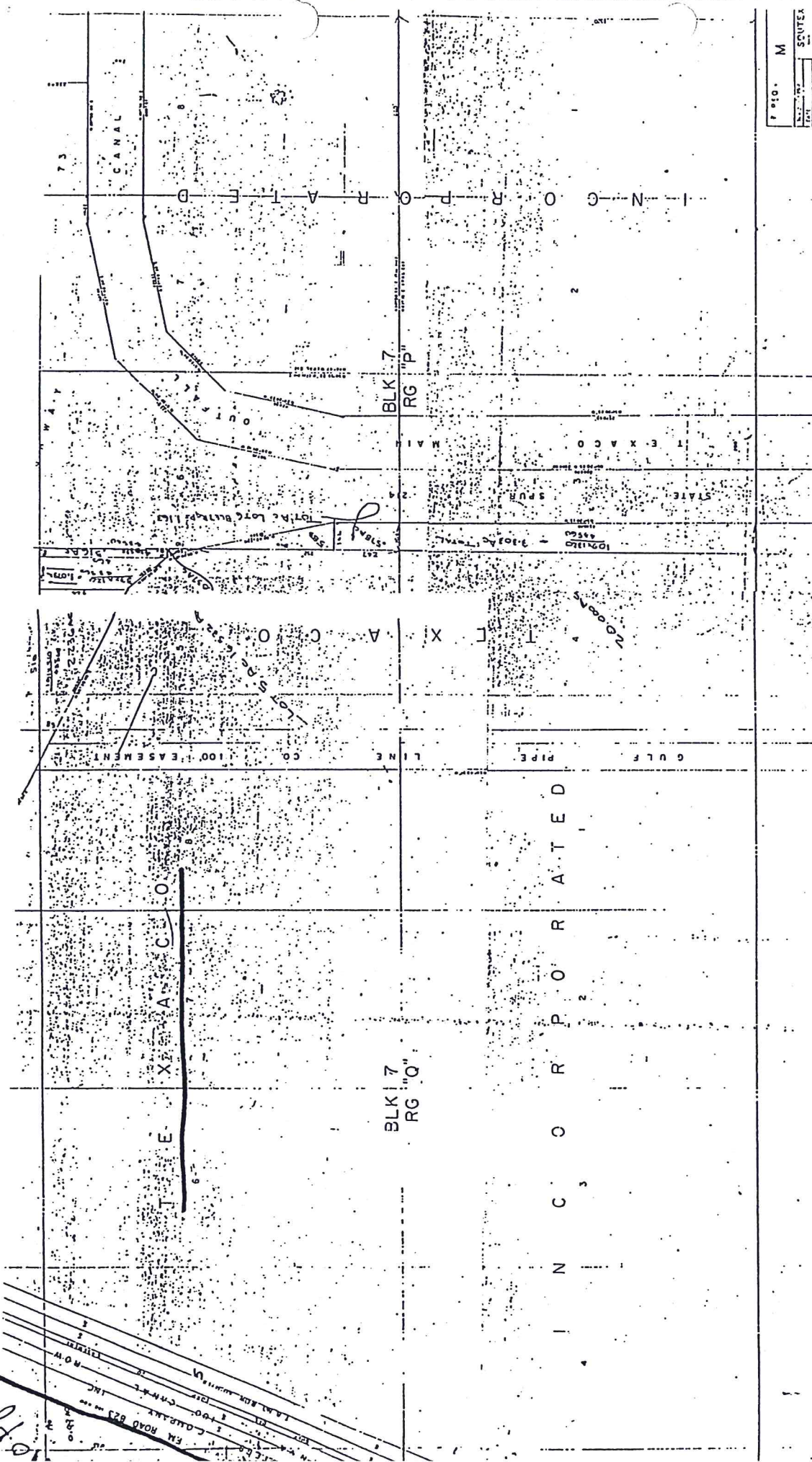
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3.62 AC

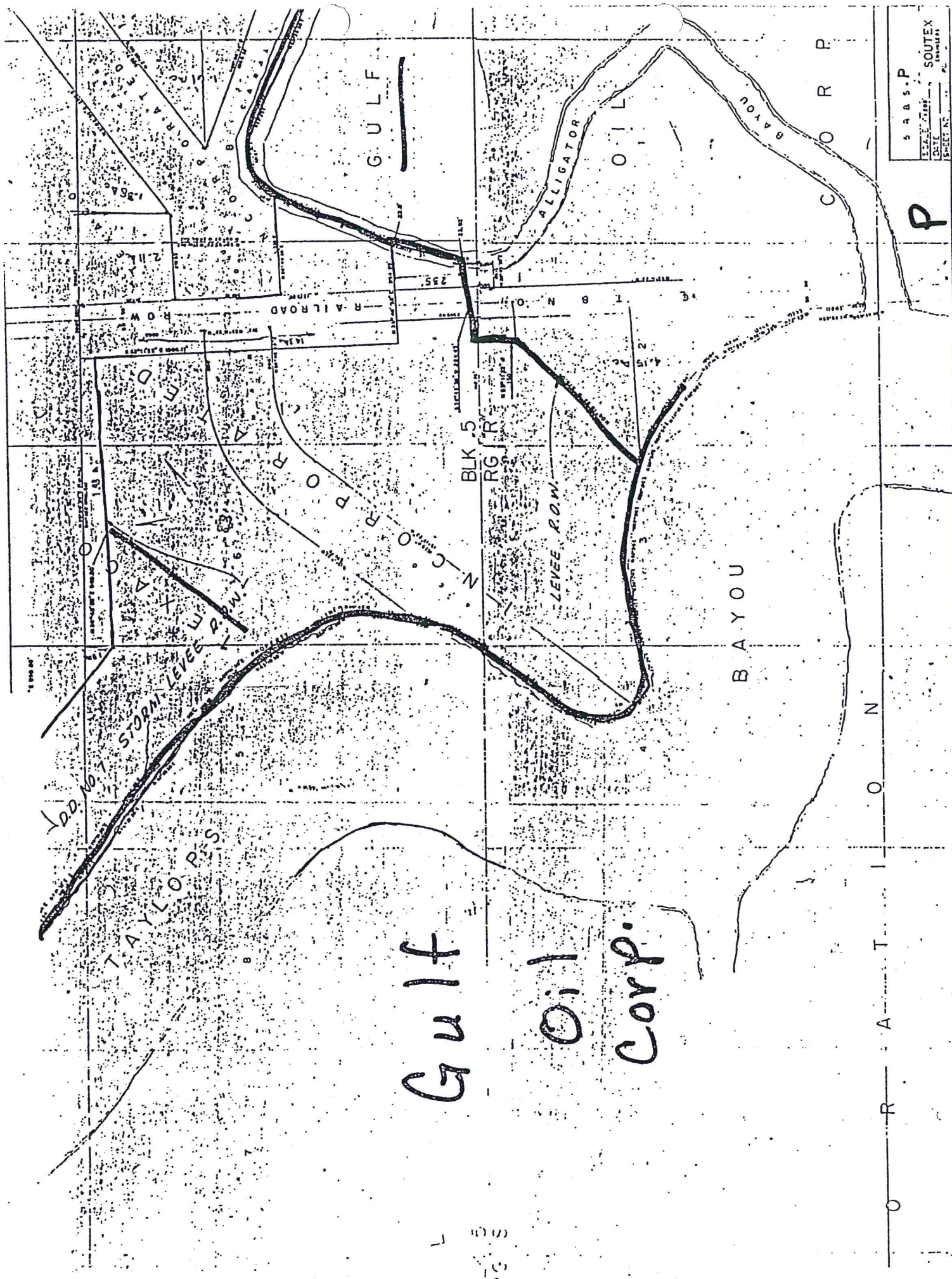
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Oppers Co.



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Sheet	1
Section	1
Block	1
Subsection	1
Tract	1
County	1
State	1

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